

reasonable interpretation of the Act permits it to reconsider the Point of Obligation Regulation, in its discretion, separately from any annual renewable fuel standards.

In short, even if the Act is ambiguous with respect to when and how often EPA must designate the appropriate obligated parties, EPA's reasonable interpretation that it need not reconsider the point of obligation in annual rulemakings must be upheld under Chevron step two. 467 U.S. at 844.

**iv. EPA's treatment of comments regarding the point of obligation as beyond the scope of the Rule is consistent with EPA's past practices and this Court's precedent.**

Despite EPA's consistent practice of fulfilling its duty to designate obligated parties through prospective regulations rather than in annual renewable fuel standards, and despite this Court's holding in Monroe Energy rejecting a challenge to the pre-existing Point of Obligation Regulation as beyond the scope of the 2013 RFS Rule, 750 F.3d at 919, the Obligated Party Petitioners oddly argue that EPA's continuation of this practice is inconsistent with its prior findings. See OPP Br. 33-35. Not so.

In EPA's 2010 implementing regulation (which the Obligated Party Petitioners quote out of context), EPA considered comments taking significantly different positions on alternative approaches to the point of obligation that "have the potential to" more evenly align RIN access to a party's obligations. 75 Fed. Reg. at 14,722. Ultimately, EPA did not change the point of obligation because

the market provides opportunities for those who need RINs to purchase them and a change would have disrupted the operation of the RFS program during an important transition period. Id. EPA concluded that “[s]hould we determine that the RIN market is not operating as intended, driving up prices for obligated parties and fuel prices for consumers, we will consider revisiting this provision in future regulatory efforts.” Id.

These prior statements are entirely consistent with EPA’s statements in the Rule. First, the Rule explains that RINs are “available for compliance,” “obligated parties can buy and sell RINs in order to ensure compliance,” and that this is exactly how the RIN “system was designed to operate.” 80 Fed. Reg. at 77,446-47. Petitioners suggest that EPA does not believe the RIN market is functioning but cite only EPA’s statement that “the RIN is currently an inefficient mechanism for reducing the price for higher level ethanol blends at retail,” which was made in reference to whether a higher percentage standard could incentivize additional supply of a particular fuel blend. See id. at 77,457. Second, it is simply not true that EPA has “refused” to consider which parties to obligate, as Petitioners repeatedly contend. See, e.g., OPP Br. 5, 6, 18, 19, 34. EPA simply said “these issues are beyond the scope of this rulemaking.” 80 Fed. Reg. at 77,431 (emphasis added). This is entirely consistent with EPA’s prior rulemakings and interpretation of its authority and with this Court’s precedent under Monroe Energy.



- v. **The proper place for Petitioners to seek to change the point of obligation is in a petition to EPA to reconsider the pre-existing regulation.**

In separate proceedings, the Obligated Party Petitioners formally petitioned EPA to change the definition of “obligated party.” On November 10, 2016, EPA proposed to deny these petitions. 81 Fed. Reg. 83,776. In a document containing 48 pages of analysis, EPA proposed to leave the current Point of Obligation Regulation unchanged. *Id.* It includes lengthy consideration of how changing the point of obligation might affect the program in achieving its overarching policy goal to increase renewable fuel use, alter the number of obligated parties and change administrative and enforcement burdens, or disrupt implementation of the RFS program. *Id.* EPA is currently seeking public comment on all aspects of the proposal. *Id.*

This separate petition process is the appropriate context for addressing Petitioners’ suggestion that EPA reconsider the Point of Obligation Regulation. If, following finalization of EPA’s administrative action, Petitioners remain unsatisfied, they will then have the right to seek judicial review of that action. 42 U.S.C. § 7607(b).

Moreover, an annual renewable fuel standard is not a suitable or efficient avenue for addressing the kind of considerations addressed in the proposed petition denial, such as which parties are best able to comply or how a change to the long-

standing Point of Obligation Regulation might impact the pace of growth in renewable fuel use. See 81 Fed. Reg. 83,776. To attempt to do so would only cause further delay in the annual standards, complicate compliance, and add confusion and uncertainty into the RFS program that would interfere with the intended increase of volumes over time.

### CONCLUSION

For the reasons explained above, the Court should deny the petitions for review.

Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATION**

Pursuant to Federal Rule of Appellate Procedure 32(g), I hereby certify that the above Brief of Respondent EPA contains 27,788 words, as counted by Microsoft Word, excluding the parts of the brief exempted by Federal Rule of Appellate Procedure 32(f), and complies with the word-limit in this Court's order of June 24, 2016 (Doc. No. 1621554). This brief complies with the typeface and type style requirements of Federal Rule of Appellate Procedure 32(a)(5) and 32(a)(6) because it has been prepared in a proportionally spaced typeface using Microsoft Word in Times New Roman 14-point type.

DATED: December 15, 2016

/s/ Lisa M. Bell  
Counsel for Respondents

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2016, I caused copies of the foregoing to be served by the Court's CM/ECF system, which will send a notice of the filing to all registered CM/ECF users.

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United States Department of Justice  
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## STATUTORY AND REGULATORY ADDENDUM

### TABLE OF CONTENTS

Except for the following, all applicable statutes and regulations are contained in the Petitioners' opening briefs.

42 U.S.C. § 7545(c) .....	A-1
42 U.S.C. § 7545(k) .....	A-3
42 U.S.C. § 7545(m) .....	A-9
42 U.S.C. § 7607(b) .....	A-12
40 C.F.R. § 80.1426 .....	A-13
40 C.F.R. § 80.1428 .....	A-23
40 C.F.R. § 80.1429 .....	A-25

### 42 U.S.C.A. § 7545(c)

#### (c) Offending fuels and fuel additives; control; prohibition

(1) The Administrator may, from time to time on the basis of information obtained under subsection (b) of this section or other information available to him, by regulation, control or prohibit the manufacture, introduction into commerce, offering for sale, or sale of any fuel or fuel additive for use in a motor vehicle, motor vehicle engine, or nonroad engine or nonroad vehicle if, in the judgment of the Administrator, any fuel or fuel additive or any emission product of such fuel or fuel additive causes, or contributes, to air pollution or water pollution (including any degradation in the quality of groundwater) that may reasonably be anticipated to endanger the public health or welfare, or (B)<sup>2</sup> if emission products of such fuel or fuel additive will impair to a significant degree the performance of any emission control device or system which is in general use, or which the Administrator finds has been developed to a point where in a reasonable time it would be in general use were such regulation to be promulgated.



\* \* \*

**(4)(A)** Except as otherwise provided in subparagraph (B) or (C), no State (or political subdivision thereof) may prescribe or attempt to enforce, for purposes of motor vehicle emission control, any control or prohibition respecting any characteristic or component of a fuel or fuel additive in a motor vehicle or motor vehicle engine--

(i) if the Administrator has found that no control or prohibition of the characteristic or component of a fuel or fuel additive under paragraph (1) is necessary and has published his finding in the Federal Register, or

(ii) if the Administrator has prescribed under paragraph (1) a control or prohibition applicable to such characteristic or component of a fuel or fuel additive, unless State prohibition or control is identical to the prohibition or control prescribed by the Administrator.

**(B)** Any State for which application of section 7543(a) of this title has at any time been waived under section 7543(b) of this title may at any time prescribe and enforce, for the purpose of motor vehicle emission control, a control or prohibition respecting any fuel or fuel additive.

**(C)(i)** A State may prescribe and enforce, for purposes of motor vehicle emission control, a control or prohibition respecting the use of a fuel or fuel additive in a motor vehicle or motor vehicle engine if an applicable implementation plan for such State under section 7410 of this title so provides. The Administrator may approve such provision in an implementation plan, or promulgate an implementation plan containing such a provision, only if he finds that the State control or prohibition is necessary to achieve the national primary or secondary ambient air quality standard which the plan implements. The Administrator may find that a State control or prohibition is necessary to achieve that standard if no other measures that would bring about timely attainment exist, or if other measures exist and are technically possible to implement, but are unreasonable or impracticable. The Administrator may make a finding of necessity under this subparagraph even if the plan for the area does not contain an approved demonstration of timely attainment.

(ii) The Administrator may temporarily waive a control or prohibition respecting the use of a fuel or fuel additive required or regulated by the Administrator pursuant to

subsection (c), (h), (i), (k), or (m) of this section or prescribed in an applicable implementation plan under section 7410 of this title approved by the Administrator under clause (i) of this subparagraph if, after consultation with, and concurrence by, the Secretary of Energy, the Administrator determines that--

(I) extreme and unusual fuel or fuel additive supply circumstances exist in a State or region of the Nation which prevent the distribution of an adequate supply of the fuel or fuel additive to consumers;

(II) such extreme and unusual fuel and fuel additive supply circumstances are the result of a natural disaster, an Act of God, a pipeline or refinery equipment failure, or another event that could not reasonably have been foreseen or prevented and not the lack of prudent planning on the part of the suppliers of the fuel or fuel additive to such State or region; and

(III) it is in the public interest to grant the waiver (for example, when a waiver is necessary to meet projected temporary shortfalls in the supply of the fuel or fuel additive in a State or region of the Nation which cannot otherwise be compensated for).

\* \* \*

#### 42 U.S.C. 7545(k)

#### **(k) Reformulated gasoline for conventional vehicles**

##### **(1) EPA regulations**

##### **(A) In general**

Not later than November 15, 1991, the Administrator shall promulgate regulations under this section establishing requirements for reformulated gasoline to be used in gasoline-fueled vehicles in specified nonattainment areas. Such regulations shall require the greatest reduction in emissions of ozone forming volatile organic compounds (during the high ozone season) and emissions of toxic air pollutants



(during the entire year) achievable through the reformulation of conventional gasoline, taking into consideration the cost of achieving such emission reductions, any nonair-quality and other air-quality related health and environmental impacts and energy requirements.

\* \* \*

## **(2) General requirements**

The regulations referred to in paragraph (1) shall require that reformulated gasoline comply with paragraph (3) and with each of the following requirements (subject to paragraph (7)):

### **(A) NO<sub>x</sub> emissions**

The emissions of oxides of nitrogen (NO<sub>x</sub>) from baseline vehicles when using the reformulated gasoline shall be no greater than the level of such emissions from such vehicles when using baseline gasoline. If the Administrator determines that compliance with the limitation on emissions of oxides of nitrogen under the preceding sentence is technically infeasible, considering the other requirements applicable under this subsection to such gasoline, the Administrator may, as appropriate to ensure compliance with this subparagraph, adjust (or waive entirely), any other requirements of this paragraph or any requirements applicable under paragraph (3)(A).

### **(B) Benzene content**

The benzene content of the gasoline shall not exceed 1.0 percent by volume.

### **(C) Heavy metals**

The gasoline shall have no heavy metals, including lead or manganese. The Administrator may waive the prohibition contained in this subparagraph for a heavy metal (other than lead) if the Administrator determines that addition of the heavy metal to the gasoline will not increase, on an aggregate mass or cancer-risk basis, toxic air pollutant emissions from motor vehicles.



**(3) More stringent of formula or performance standards**

The regulations referred to in paragraph (1) shall require compliance with the more stringent of either the requirements set forth in subparagraph (A) or the requirements of subparagraph (B) of this paragraph. For purposes of determining the more stringent provision, clause (i) and clause (ii) of subparagraph (B) shall be considered independently.

**(A) Formula****(i) Benzene**

The benzene content of the reformulated gasoline shall not exceed 1.0 percent by volume.

**(ii) Aromatics**

The aromatic hydrocarbon content of the reformulated gasoline shall not exceed 25 percent by volume.

**(iii) Lead**

The reformulated gasoline shall have no lead content.

**(iv) Detergents**

The reformulated gasoline shall contain additives to prevent the accumulation of deposits in engines or vehicle fuel supply systems.

**(B) Performance standard****(i) VOC emissions**

During the high ozone season (as defined by the Administrator), the aggregate emissions of ozone forming volatile organic compounds from baseline vehicles when using the reformulated gasoline shall be 15 percent below the aggregate

emissions of ozone forming volatile organic compounds from such vehicles when using baseline gasoline. Effective in calendar year 2000 and thereafter, 25 percent shall be substituted for 15 percent in applying this clause, except that the Administrator may adjust such 25 percent requirement to provide for a lesser or greater reduction based on technological feasibility, considering the cost of achieving such reductions in VOC emissions. No such adjustment shall provide for less than a 20 percent reduction below the aggregate emissions of such air pollutants from such vehicles when using baseline gasoline. The reductions required under this clause shall be on a mass basis.

#### **(ii) Toxics**

During the entire year, the aggregate emissions of toxic air pollutants from baseline vehicles when using the reformulated gasoline shall be 15 percent below the aggregate emissions of toxic air pollutants from such vehicles when using baseline gasoline. Effective in calendar year 2000 and thereafter, 25 percent shall be substituted for 15 percent in applying this clause, except that the Administrator may adjust such 25 percent requirement to provide for a lesser or greater reduction based on technological feasibility, considering the cost of achieving such reductions in toxic air pollutants. No such adjustment shall provide for less than a 20 percent reduction below the aggregate emissions of such air pollutants from such vehicles when using baseline gasoline. The reductions required under this clause shall be on a mass basis.

Any reduction greater than a specific percentage reduction required under this subparagraph shall be treated as satisfying such percentage reduction requirement.

### **(4) Certification procedures**

#### **(A) Regulations**

The regulations under this subsection shall include procedures under which the Administrator shall certify reformulated gasoline as complying with the requirements established pursuant to this subsection. Under such regulations, the Administrator shall establish procedures for any person to petition the Administrator to certify a fuel formulation, or slate of fuel formulations. Such procedures shall further require that the Administrator shall approve or deny such petition within 180 days of receipt. If the Administrator fails to act within such 180-



day period, the fuel shall be deemed certified until the Administrator completes action on the petition.

**(B) Certification; equivalency**

The Administrator shall certify a fuel formulation or slate of fuel formulations as complying with this subsection if such fuel or fuels--

- (i) comply with the requirements of paragraph (2), and
- (ii) achieve equivalent or greater reductions in emissions of ozone forming volatile organic compounds and emissions of toxic air pollutants than are achieved by a reformulated gasoline meeting the applicable requirements of paragraph (3).

**(C) EPA determination of emissions level**

Within 1 year after November 15, 1990, the Administrator shall determine the level of emissions of ozone forming volatile organic compounds and emissions of toxic air pollutants emitted by baseline vehicles when operating on baseline gasoline. For purposes of this subsection, within 1 year after November 15, 1990, the Administrator shall, by rule, determine appropriate measures of, and methodology for, ascertaining the emissions of air pollutants (including calculations, equipment, and testing tolerances).

**(5) Prohibition**

Effective beginning January 1, 1995, each of the following shall be a violation of this subsection:

- (A) The sale or dispensing by any person of conventional gasoline to ultimate consumers in any covered area.
- (B) The sale or dispensing by any refiner, blender, importer, or marketer of conventional gasoline for resale in any covered area, without (i) segregating such gasoline from reformulated gasoline, and (ii) clearly marking such conventional



gasoline as “conventional gasoline, not for sale to ultimate consumer in a covered area”.

Any refiner, blender, importer or marketer who purchases property<sup>6</sup> segregated and marked conventional gasoline, and thereafter labels, represents, or wholesales such gasoline as reformulated gasoline shall also be in violation of this subsection. The Administrator may impose sampling, testing, and record-keeping requirements upon any refiner, blender, importer, or marketer to prevent violations of this section.

## **(6) Opt-in areas**

### **(A) Classified areas**

#### **(i) In general**

Upon the application of the Governor of a State, the Administrator shall apply the prohibition set forth in paragraph (5) in any area in the State classified under subpart 2 of part D of subchapter 1 of this chapter as a Marginal, Moderate, Serious, or Severe Area (without regard to whether or not the 1980 population of the area exceeds 250,000). In any such case, the Administrator shall establish an effective date for such prohibition as he deems appropriate, not later than January 1, 1995, or 1 year after such application is received, whichever is later. The Administrator shall publish such application in the Federal Register upon receipt.

#### **(ii) Effect of insufficient domestic capacity to produce reformulated gasoline**

If the Administrator determines, on the Administrator's own motion or on petition of any person, after consultation with the Secretary of Energy, that there is insufficient domestic capacity to produce gasoline certified under this subsection, the Administrator shall, by rule, extend the effective date of such prohibition in Marginal, Moderate, Serious, or Severe Areas referred to in clause (i) for one additional year, and may, by rule, renew such extension for 2 additional one-year periods. The Administrator shall act on any petition submitted under this subparagraph within 6 months after receipt of the petition. The Administrator shall issue such extensions for areas with a lower ozone classification before issuing any such extension for areas with a higher classification.

**(B) Ozone transport region****(i) Application of prohibition****(I) In general**

On application of the Governor of a State in the ozone transport region established by section 7511c(a) of this title, the Administrator, not later than 180 days after the date of receipt of the application, shall apply the prohibition specified in paragraph (5) to any area in the State (other than an area classified as a marginal, moderate, serious, or severe ozone nonattainment area under subpart 2 of part D of subchapter I of this chapter) unless the Administrator determines under clause (iii) that there is insufficient capacity to supply reformulated gasoline.

\* \* \*

**42 U.S.C. § 7545(m)****(m) Oxygenated fuels****(1) Plan revisions for CO nonattainment areas**

**(A)** Each State in which there is located all or part of an area which is designated under subchapter I of this chapter as a nonattainment area for carbon monoxide and which has a carbon monoxide design value of 9.5 parts per million (ppm) or above based on data for the 2-year period of 1988 and 1989 and calculated according to the most recent interpretation methodology issued by the Administrator prior to November 15, 1990, shall submit to the Administrator a State implementation plan revision under section 7410 of this title and part D of subchapter I of this chapter for such area which shall contain the provisions specified under this subsection regarding oxygenated gasoline.

**(B)** A plan revision which contains such provisions shall also be submitted by each



State in which there is located any area which, for any 2-year period after 1989 has a carbon monoxide design value of 9.5 ppm or above. The revision shall be submitted within 18 months after such 2-year period.

**(2) Oxygenated gasoline in CO nonattainment areas**

Each plan revision under this subsection shall contain provisions to require that any gasoline sold, or dispensed, to the ultimate consumer in the carbon monoxide nonattainment area or sold or dispensed directly or indirectly by fuel refiners or marketers to persons who sell or dispense to ultimate consumers, in the larger of--

(A) the Consolidated Metropolitan Statistical Area (CMSA) in which the area is located, or

(B) if the area is not located in a CMSA, the Metropolitan Statistical Area in which the area is located,

be blended, during the portion of the year in which the area is prone to high ambient concentrations of carbon monoxide to contain not less than 2.7 percent oxygen by weight (subject to a testing tolerance established by the Administrator). The portion of the year in which the area is prone to high ambient concentrations of carbon monoxide shall be as determined by the Administrator, but shall not be less than 4 months. At the request of a State with respect to any area designated as nonattainment for carbon monoxide, the Administrator may reduce the period specified in the preceding sentence if the State can demonstrate that because of meteorological conditions, a reduced period will assure that there will be no exceedances of the carbon monoxide standard outside of such reduced period. For areas with a carbon monoxide design value of 9.5 ppm or more of November 15, 1990, the revision shall provide that such requirement shall take effect no later than November 1, 1992 (or at such other date during 1992 as the Administrator establishes under the preceding provisions of this paragraph). For other areas, the revision shall provide that such requirement shall take effect no later than November 1 of the third year after the last year of the applicable 2-year period referred to in paragraph (1) (or at such other date during such third year as the Administrator establishes under the preceding provisions of this paragraph) and shall include a program for implementation and enforcement of the requirement consistent with guidance to be issued by the Administrator.



### (3) Waivers

(A) The Administrator shall waive, in whole or in part, the requirements of paragraph (2) upon a demonstration by the State to the satisfaction of the Administrator that the use of oxygenated gasoline would prevent or interfere with the attainment by the area of a national primary ambient air quality standard (or a State or local ambient air quality standard) for any air pollutant other than carbon monoxide.

(B) The Administrator shall, upon demonstration by the State satisfactory to the Administrator, waive the requirement of paragraph (2) where the Administrator determines that mobile sources of carbon monoxide do not contribute significantly to carbon monoxide levels in an area.

(C)(i) Any person may petition the Administrator to make a finding that there is, or is likely to be, for any area, an inadequate domestic supply of, or distribution capacity for, oxygenated gasoline meeting the requirements of paragraph (2) or fuel additives (oxygenates) necessary to meet such requirements. The Administrator shall act on such petition within 6 months after receipt of the petition.

(ii) If the Administrator determines, in response to a petition under clause (i), that there is an inadequate supply or capacity described in clause (i), the Administrator shall delay the effective date of paragraph (2) for 1 year. Upon petition, the Administrator may extend such effective date for one additional year. No partial delay or lesser waiver may be granted under this clause.

(iii) In granting waivers under this subparagraph the Administrator shall consider distribution capacity separately from the adequacy of domestic supply and shall grant such waivers in such manner as will assure that, if supplies of oxygenated gasoline are limited, areas having the highest design value for carbon monoxide will have a priority in obtaining oxygenated gasoline which meets the requirements of paragraph (2).

\* \* \*

**42 U.S.C.A. § 7607(b)****(b) Judicial review**

(1) A petition for review of action of the Administrator in promulgating any national primary or secondary ambient air quality standard, any emission standard or requirement under section 7412 of this title, any standard of performance or requirement under section 7411 of this title,<sup>2</sup> any standard under section 7521 of this title (other than a standard required to be prescribed under section 7521(b)(1) of this title), any determination under section 7521(b)(5) of this title, any control or prohibition under section 7545 of this title, any standard under section 7571 of this title, any rule issued under section 7413, 7419, or under section 7420 of this title, or any other nationally applicable regulations promulgated, or final action taken, by the Administrator under this chapter may be filed only in the United States Court of Appeals for the District of Columbia. A petition for review of the Administrator's action in approving or promulgating any implementation plan under section 7410 of this title or section 7411(d) of this title, any order under section 7411(j) of this title, under section 7412 of this title, under section 7419 of this title, or under section 7420 of this title, or his action under section 1857c-10(c)(2)(A), (B), or (C) of this title (as in effect before August 7, 1977) or under regulations thereunder, or revising regulations for enhanced monitoring and compliance certification programs under section 7414(a)(3) of this title, or any other final action of the Administrator under this chapter (including any denial or disapproval by the Administrator under subchapter I of this chapter) which is locally or regionally applicable may be filed only in the United States Court of Appeals for the appropriate circuit. Notwithstanding the preceding sentence a petition for review of any action referred to in such sentence may be filed only in the United States Court of Appeals for the District of Columbia if such action is based on a determination of nationwide scope or effect and if in taking such action the Administrator finds and publishes that such action is based on such a determination. Any petition for review under this subsection shall be filed within sixty days from the date notice of such promulgation, approval, or action appears in the Federal Register, except that if such petition is based solely on grounds arising after such sixtieth day, then any petition for review under this subsection shall be filed within sixty days after such grounds arise. The filing of a petition for reconsideration by the Administrator of any otherwise final rule or action shall not affect the finality of such rule or action for purposes of judicial review nor extend the time within which a petition for judicial review of such rule or action under this section may be filed, and shall not postpone the effectiveness of such rule or action.



(2) Action of the Administrator with respect to which review could have been obtained under paragraph (1) shall not be subject to judicial review in civil or criminal proceedings for enforcement. Where a final decision by the Administrator defers performance of any nondiscretionary statutory action to a later time, any person may challenge the deferral pursuant to paragraph (1).

#### 40 C.F.R. § 80.1426

§ 80.1426 How are RINs generated and assigned to batches of renewable fuel by renewable fuel producers or importers?

(a) General requirements.—

(1) To the extent permitted under paragraphs (b) and (c) of this section, producers and importers of renewable fuel must generate RINs to represent that fuel if all of the following occur:

(i) The fuel qualifies for a D code pursuant to § 80.1426(f), or the EPA has approved a petition for use of a D code pursuant to § 80.1416.

(ii) The fuel is demonstrated to be produced from renewable biomass pursuant to the reporting requirements of § 80.1451 and the recordkeeping requirements of § 80.1454.

(A) Feedstocks meeting the requirements of renewable biomass through the aggregate compliance provision at § 80.1454(g) are deemed to be renewable biomass.

(B) [Reserved]

(iii) Was produced in compliance with the registration requirements of § 80.1450, the reporting requirements of § 80.1451, the recordkeeping requirements of § 80.1454, and all other applicable requirements of this subpart M.

(iv) The renewable fuel is designated on a product transfer document (PTD) for use



as transportation fuel, heating oil, or jet fuel in accordance with § 80.1453(a)(12).

(2) To generate RINs for imported renewable fuel, including any renewable fuel contained in imported transportation fuel, heating oil, or jet fuel, importers must obtain information from a foreign producer that is registered pursuant to § 80.1450 sufficient to make the appropriate determination regarding the applicable D code and compliance with the renewable biomass definition for each imported batch for which RINs are generated.

(3) A party generating a RIN shall specify the appropriate numerical values for each component of the RIN in accordance with the provisions of § 80.1425(a) and paragraph (f) of this section.

(b) Regional applicability.—

(1) Except as provided in paragraph (c) of this section, a RIN must be generated by a renewable fuel producer or importer for a batch of renewable fuel that satisfies the requirements of paragraph (a)(1) of this section if it is produced or imported for use as transportation fuel, heating oil, or jet fuel in the 48 contiguous states or Hawaii.

(2) If the Administrator approves a petition of Alaska or a United States territory to opt-in to the renewable fuel program under the provisions in § 80.1443, then the requirements of paragraph (b)(1) of this section shall also apply to renewable fuel produced or imported for use as transportation fuel, heating oil, or jet fuel in that state or territory beginning in the next calendar year.

(c) Cases in which RINs are not generated.—

(1) Fuel producers and importers may not generate RINs for fuel that does not satisfy the requirements of paragraph (a)(1) of this section.

(2) Small producer/importer threshold. Pursuant to § 80.1455(a) and (b), renewable fuel producers that produce less than 10,000 gallons a year of renewable fuel, and importers that import less than 10,000 gallons a year of renewable fuel, are not required to generate and assign RINs to batches of renewable fuel that satisfy the

requirements of paragraph (a)(1) of this section that they produce or import.

(3) Temporary new producer threshold. Pursuant to § 80.1455(c) and (d), new renewable fuel producers that produce less than 125,000 gallons of renewable fuel a year are not required to generate and assign RINs to batches of renewable fuel to satisfy the requirements of paragraph (a)(1) of this section.

(i) The provisions of this paragraph (c)(3) apply only to new facilities, for a maximum of three years beginning with the calendar year in which the production facility produces its first gallon of renewable fuel.

(ii) [Reserved]

(4) Importers shall not generate RINs for renewable fuel imported from a foreign renewable fuel producer, or for renewable fuel made with ethanol produced by a foreign ethanol producer, unless the foreign renewable fuel producer or foreign ethanol producer is registered with EPA as required in § 80.1450.

(5) Importers shall not generate RINs for renewable fuel that has already been assigned RINs by a registered foreign producer.

(6) A party is prohibited from generating RINs for a volume of fuel that it produces if the fuel has been produced by a process that uses a renewable fuel as a feedstock, and the renewable fuel that is used as a feedstock was produced by another party, except that RINs may be generated for such fuel if allowed by the EPA in response to a petition submitted pursuant to § 80.1416 and the petition approval specifies a mechanism to prevent double counting of RINs.

(7) For renewable fuel oil that is heating oil as defined in paragraph (2) of the definition of heating oil in § 80.1401, renewable fuel producers and importers shall not generate RINs unless they have received affidavits from the final end user or users of the fuel oil as specified in § 80.1451(b)(1)(ii)(I)(2).

(d)(1) Definition of batch. For the purposes of this section and § 80.1425, a “batch of renewable fuel” is a volume of renewable fuel that has been assigned a unique identifier within a calendar year by the producer or importer of the renewable fuel in accordance with the provisions of this section and § 80.1425.



(i) The number of gallon-RINs generated for a batch of renewable fuel may not exceed 99,999,999.

(ii) A batch of renewable fuel cannot represent renewable fuel produced or imported in excess of one calendar month.

(2) Multiple gallon-RINs generated to represent a given volume of renewable fuel can be represented by a single batch-RIN through the appropriate designation of the RIN volume codes SSSSSSSS and EEEEEEEE.

(i) The value of SSSSSSSS in the batch-RIN shall be 00000001 to represent the first gallon-RIN associated with the volume of renewable fuel.

(ii) The value of EEEEEEEE in the batch-RIN shall represent the last gallon-RIN associated with the volume of renewable fuel, based on the RIN volume  $V_{\text{RIN}}$  determined pursuant to paragraph (f) of this section.

(iii) Under § 80.1452, RIN volumes will be managed by EMTS. RIN codes SSSSSSSS and EEEEEEEE do not have a role in EMTS.

(c) Assignment of RINs to batches.—

(1) Except as provided in paragraph (g) of this section for delayed RINs, the producer or importer of renewable fuel must assign all RINs generated to volumes of renewable fuel.

(2) A RIN is assigned to a volume of renewable fuel when ownership of the RIN is transferred along with the transfer of ownership of the volume of renewable fuel, pursuant to § 80.1428(a).

(3) All assigned RINs shall have a K code value of 1.

(f) Generation of RINs—



(1) Applicable pathways. D codes shall be used in RINs generated by producers or importers of renewable fuel according to the pathways listed in Table 1 to this section, paragraph (f)(6) of this section, or as approved by the Administrator. In choosing an appropriate D code, producers and importers may disregard any incidental, de minimis feedstock contaminants that are impractical to remove and are related to customary feedstock production and transport. Tables 1 and 2 to this section do not apply to, and impose no requirements with respect to, volumes of fuel for which RINs are generated pursuant to paragraph (f)(6) of this section.

**Table 1 to § 80.1426—Applicable D Codes for Each Fuel Pathway for Use in Generating RINs**

Fuel type	Feedstock	Production process requirements	D-Code
A.....Ethanol .....	Corn starch .....	All of the following: Dry mill process, using natural gas, biomass, or biogas for process energy and at least two advanced technologies from Table 2 to this section.	6
B.....Ethanol .....	Corn starch .....	All of the following: Dry mill process, using natural gas, biomass, or biogas for process energy and at least one of the advanced technologies from Table 2 to this section plus drying no more than 65%	6

			of the distillers grains with solubles it markets annually	
C.....Ethanol .....	Corn starch .....		All of the following: Dry mill process, using natural gas, biomass, or biogas for process energy and drying no more than 50% of the distillers grains with solubles it markets annually	6
D.....Ethanol .....	Corn starch .....		Wet mill process using biomass or biogas for process energy	6
E.....Ethanol .....	Starches from crop residue and annual covercrops		Fermentation using natural gas, biomass, or biogas for process energy	6
F.....	Biodiesel, renewable diesel, jet fuel and heating oil	Soy bean oil; Oil from annual covercrops; Oil from algae grown photosynthetically; Biogenic waste oils/fats/greases; Non-food grade corn oil; Camelina sativa oil.	One of the following: Trans-Esterification Hydrotreating Excluding processes that co-process renewable biomass and petroleum.	4

G ....	Biodiesel, heating oil	Canola/Rapeseed oil .....	Trans-Esterification using natural gas or biomass for process energy	4
H ....	Biodiesel, renewable diesel, jet fuel and heating oil	Soy bean oil; Oil from annual covercrops; Oil from algae grown photosynthetically; Biogenic waste oils/fats/greases; Non-food grade corn oil; Camelina sativa oil.	One of the following: Trans-Esterification Hydrotreating Includes only processes that co-process renewable biomass and petroleum.	5
I.....	Naphtha, LPG .....	Camelina sativa oil .....	Hydrotreating .....	5
J.....	Ethanol .....	Sugarcane .....	Fermentation .....	5
K ....	Ethanol	Crop residue, slash, pre-commercial thinnings and tree residue, switchgrass, miscanthus, energy cane, Arundo donax, Pennisetum purpureum, and separated yard waste; biogenic components of separated MSW; cellulosic components of separated food waste; and cellulosic components of	Any process that converts cellulosic biomass to fuel	3



annual cover crops

L.....	Cellulosic diesel, jet fuel and heating oil	Crop residue, slash, pre-commercial thinnings and tree residue, switchgrass, miscanthus, energy cane, Arundo donax, Pennisetum purpureum, and separated yard waste; biogenic components of separated MSW; cellulosic components of separated food waste; and cellulosic components of annual cover crops	Any process that converts cellulosic biomass to fuel	7
M.....	Renewable gasoline and renewable gasoline blendstock	Crop residue, slash, pre-commercial thinnings, tree residue, and separated yard waste; biogenic components of separated MSW; cellulosic components of separated food waste; and cellulosic components of annual cover crops	Catalytic Pyrolysis and Upgrading, Gasification and Upgrading, Thermo-Catalytic Hydrodeoxygenation and Upgrading, Direct Biological Conversion, Biological Conversion and Upgrading utilizing natural gas, biogas, and/or biomass as the only process energy sources providing that process used	3

			converts cellulosic biomass to fuel; any process utilizing biogas and/or biomass as the only process energy sources which converts cellulosic biomass to fuel	
N ....	Naphtha	Switchgrass, miscanthus, energy cane, Arundo donax, and Pennisetum purpureum	Gasification and upgrading processes that converts cellulosic biomass to fuel	3
O ....	Butanol	Corn starch	Fermentation; dry mill using natural gas, biomass, or biogas for process energy.	6
P .....	Ethanol, renewable diesel, jet fuel, heating oil, and naphtha	The non-cellulosic portions of separated food waste and non-cellulosic components of annual cover crops	Any	
Q ....	Renewable Compressed Natural Gas, Renewable Liquefied Natural Gas, Renewable Electricity	Biogas from landfills, municipal wastewater treatment facility digesters, agricultural digesters, and separated MSW digesters; and biogas	Any	3

from the cellulosic  
components of  
biomass processed  
in other waste  
digesters

R.....	Ethanol .....	Grain Sorghum .....	Dry mill process using biogas from landfills, waste treatment plants, and/or waste digesters, and/or natural gas, for process energy.	6
S.....	Ethanol .....	Grain Sorghum .....	Dry mill process, using only biogas from landfills, waste treatment plants, and/or waste digesters for process energy and for on- site production of all electricity used at the site other than up to 0.15 kWh of electricity from the grid per gallon of ethanol produced, calculated on a per batch basis.	5
T.....	Renewable Compressed Natural Gas, Renewable Liquefied Natural Gas, and Renewable Electricity	Biogas from waste digesters	Any	5



\* \* \*

#### 40 C.F.R. § 80.1428

##### § 80.1428 General requirements for RIN distribution.

(a) RINs assigned to volumes of renewable fuel.

(1) Assigned RIN, for the purposes of this subpart, means a RIN assigned to a volume of renewable fuel pursuant to § 80.1426(e) with a K code of 1.

(2) Except as provided in § 80.1429, no person can separate a RIN that has been assigned to a batch pursuant to § 80.1426(e).

(3) An assigned RIN cannot be transferred to another person without simultaneously transferring a volume of renewable fuel to that same person.

(4) No more than 2.5 assigned gallon-RINs with a K code of 1 can be transferred to another person with every gallon of renewable fuel transferred to that same person.

(5)(i) On each of the dates listed in paragraph (a)(5)(ii) of this section in any calendar year, the following equation must be satisfied for assigned RINs and volumes of renewable fuel owned by a person:

$$\Sigma (RIN)_D \leq \Sigma (V_{si} * 2.5)_D$$

Where:

D = Applicable date.

$\Sigma (RIN)_D$  = Sum of all assigned gallon-RINs with a K code of 1 that are owned on

date D.

$(V_{si})_D$  = Volume *i* of renewable fuel owned on date D, standardized to 60 °F, in gallons.

(ii) The applicable dates are March 31, June 30, September 30, and December 31.

(6) Any transfer of ownership of assigned RINs must be documented on product transfer documents generated pursuant to § 80.1453.

(i) The RIN must be recorded on the product transfer document used to transfer ownership of the volume of renewable fuel to another person; or

(ii) The RIN must be recorded on a separate product transfer document transferred to the same person on the same day as the product transfer document used to transfer ownership of the volume of renewable fuel.

(b) RINs separated from volumes of renewable fuel.

(1) Separated RIN, for the purposes of this subpart, means a RIN with a K code of 2 that has been separated from a volume of renewable fuel pursuant to § 80.1429.

(2) Any person that has registered pursuant to § 80.1450 can own a separated RIN.

(3) Separated RINs can be transferred any number of times.

(c) RIN expiration. Except as provided in § 80.1427(a)(7), a RIN is valid for compliance during the calendar year in which it was generated, or the following calendar year. Any RIN that is not used for compliance purposes for the calendar year in which it was generated, or for the following calendar year, will be considered an expired RIN. Pursuant to § 80.1431(a), an expired RIN will be considered an invalid RIN and cannot be used for compliance purposes.

(d) Any batch-RIN can be divided into multiple batch-RINs, each representing a

smaller number of gallon-RINs, if all of the following conditions are met:

- (1) All RIN components other than SSSSSSSS and EEEEEEEE are identical for the original parent and newly formed daughter RINs.
- (2) The sum of the gallon-RINs associated with the multiple daughter batch-RINs is equal to the gallon-RINs associated with the parent batch-RIN.

#### 40 C.F.R. § 80.1429

§ 80.1429 Requirements for separating RINs from volumes of renewable fuel.

(a)(1) Separation of a RIN from a volume of renewable fuel means termination of the assignment of the RIN to a volume of renewable fuel.

(2) RINs that have been separated from volumes of renewable fuel become separated RINs subject to the provisions of § 80.1428(b).

(b) A RIN that is assigned to a volume of renewable fuel can be separated from that volume only under one of the following conditions:

(1) Except as provided in paragraphs (b)(7) and (b)(9) of this section, a party that is an obligated party according to § 80.1406 must separate any RINs that have been assigned to a volume of renewable fuel if that party owns that volume.

(2) Except as provided in paragraph (b)(6) of this section, any party that owns a volume of renewable fuel must separate any RINs that have been assigned to that volume once the volume is blended with gasoline or fossil-based diesel to produce a transportation fuel, heating oil, or jet fuel. A party may separate up to 2.5 RINs per gallon of blended renewable fuel.

(3) Any party that exports a volume of renewable fuel must separate any RINs that have been assigned to the exported volume. A party may separate up to 2.5 RINs per gallon of exported renewable fuel.



(4) Any party that produces, imports, owns, sells, or uses a volume of neat renewable fuel, or a blend of renewable fuel and diesel fuel, must separate any RINs that have been assigned to that volume of neat renewable fuel or that blend if:

(i) The party designates the neat renewable fuel or blend as transportation fuel, heating oil, or jet fuel; and

(ii) The neat renewable fuel or blend is used without further blending, in the designated form, as transportation fuel, heating oil, or jet fuel.

(5) Any party that produces, imports, owns, sells, or uses a volume of electricity or biogas for which RINs have been generated in accordance with § 80.1426(f) must separate any RINs that have been assigned to that volume of renewable electricity or biogas if:

(i) The party designates the electricity or biogas as transportation fuel; and

(ii) The electricity or biogas is used as transportation fuel.

(6) RINs assigned to a volume of biodiesel (mono-alkyl ester) can only be separated from that volume pursuant to paragraph (b)(2) of this section if such biodiesel is blended into diesel fuel at a concentration of 80 volume percent biodiesel (mono-alkyl ester) or less.

(i) This paragraph (b)(6) shall not apply to biodiesel owned by obligated parties or to exported volumes of biodiesel.

(ii) This paragraph (b)(6) shall not apply to parties meeting the requirements of paragraph (b)(4) of this section.

(7) For RINs that an obligated party generates for renewable fuel that has not been blended into gasoline or diesel to produce a transportation fuel, heating oil, or jet fuel, the obligated party can only separate such RINs from volumes of renewable

fuel if the number of gallon-RINs separated in a calendar year are less than or equal to a limit set as follows:

- (i) For RINs with a D code of 3, the limit shall be equal to  $RVO_{CB}$ .
- (ii) For RINs with a D code of 4, the limit shall be equal to  $RVO_{BBD}$ .
- (iii) For RINs with a D code of 7, the limit shall be equal to the larger of  $RVO_{BBD}$  or  $RVO_{CB}$ .
- (iv) For RINs with a D code of 5, the limit shall be equal to  $RVO_{AB} - RVO_{CB} - RVO_{BBD}$ .
- (v) For RINs with a D code of 6, the limit shall be equal to  $RVO_{RF} - RVO_{AB}$ .

(8) Small refiners and small refineries may only separate RINs that have been assigned to volumes of renewable fuel that the party blends into gasoline or diesel to produce transportation fuel, heating oil, or jet fuel, or that the party used as transportation fuel, heating oil, or jet fuel. This paragraph (b)(8) shall apply only under the following conditions:

- (i) During the calendar year in which the party has received a small refinery exemption under § 80.1441 or a small refiner exemption under § 80.1442; and
- (ii) The party is not otherwise an obligated party during the period of time that the small refinery or small refiner exemption is in effect.

(9) Except as provided in paragraphs (b)(2) through (b)(5) and (b)(8) of this section, parties whose non-export renewable volume obligations are solely related to either the importation of products listed in § 80.1407(c) or § 80.1407(e) or to the addition of blendstocks into a volume of finished gasoline, finished diesel fuel, RBOB, or CBOB, can only separate RINs from volumes of renewable fuel if the number of gallon-RINs separated in a calendar year is less than or equal to a limit set as follows:



(i) For RINs with a D code of 3, the limit shall be equal to  $RVO_{CB}$ .

(ii) For RINs with a D code of 4, the limit shall be equal to  $RVO_{BBD}$ .

(iii) For RINs with a D code of 7, the limit shall be equal to the larger of  $RVO_{BBD}$  or  $RVO_{CB}$ .

(iv) For RINs with a D code of 5, the limit shall be equal to  $RVO_{AB} - RVO_{CB} - RVO_{BBD}$ .

(v) For RINs with a D code of 6, the limit shall be equal to  $RVO_{RI} - RVO_{AB}$ .

(10) Any party that produces a volume of renewable fuel may separate any RINs that have been generated to represent that volume of renewable fuel or that blend if that party retires the separated RINs to replace invalid RINs according to § 80.1474.

(c) The party responsible for separating a RIN from a volume of renewable fuel shall change the K code in the RIN from a value of 1 to a value of 2 prior to transferring the RIN to any other party.

(d) Upon and after separation of a RIN from its associated volume of renewable fuel, the separated RIN must be accompanied by a PTD pursuant to § 80.1453 when transferred to another party.

(e) Upon and after separation of a RIN from its associated volume of renewable fuel, product transfer documents used to transfer ownership of the volume must meet the requirements of § 80.1453.

(f) [Reserved by 79 FR 42115]

(g) Any 2009 or 2010 RINs retired pursuant to § 80.1129 because renewable fuel was used in a nonroad vehicle or nonroad engine (except for ocean-going vessels), or as heating oil or jet fuel may be reinstated by the retiring party for sale or use to demonstrate compliance with a 2010 RVO.





## API: CONSUMER DEMAND FOR ETHANOL-FREE GASOLINE IS STRONG AND RISING

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WASHINGTON, May 20, 2015 – Demand for ethanol-free gasoline (E0) is on the rise, growing from 3.4 percent of gasoline demand in 2012 to just shy of 7 percent in 2014, according to a [chart](http://www.api.org/~media/files/policy/fuels-and-renewables/eo-chart/eo-estimation-chart.pdf) (<http://www.api.org/~media/files/policy/fuels-and-renewables/eo-chart/eo-estimation-chart.pdf>) compiled by API using data from the Energy Information Administration.

"Demand for E0 is strong and growing, and EPA must take this into account as it prepares to release biofuel mandates for 2014, 2015, and 2016," API Downstream Group Director Bob Greco told reporters in a joint conference call Wednesday (<http://www.api.org/news-and-media/testimony-speeches/2015/bob-greco-press-conference-call-on-the-rfs>) with the National Marine Manufacturers Association (NMMA). "Consumers want E0 for their boats, for lawn equipment, for recreational vehicles and for classic cars."

Strong demand for E0 stands in stark contrast to demand for high ethanol blends like E85, which represents only 0.15 percent of overall gasoline demand, according to Greco. He said that demand for E85 in recent years has been relatively flat, despite more stations offering E85 as an option.

"We remain concerned that EPA may raise ethanol requirements based on the specious reasoning that E85 – a mixture of up to 85 percent ethanol with 15 percent gasoline – is a workable solution," Greco said. "EPA should not try to mandate a market for fuels like E85 for which there is no demand while trying to eliminate fuels like E0 for which actual consumers have shown a substantial demand. . . Consumers' interest should come ahead of the ethanol interests."

"Many boaters rely on E0 to power their vessels," said Nicole Vasilaros, vice president of federal and legal affairs for NMMA. "E0 is not guaranteed to remain available as a result of the RFS and the influx of higher ethanol blends. An inability to find E0 or a simple misfueling mistake could cause boaters to see engine stalling, corrosion leading to oil or fuel leaks, increased emissions and damaged valves, rubber fuel lines and gaskets."

API is the only national trade association representing all facets of the oil and natural gas industry, which supports 9.8 million U.S. jobs and 8 percent of the U.S. economy. API's more than 625 members include large integrated companies, as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. They provide most of the nation's energy and are backed by a growing grassroots movement of more than 25 million Americans.

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ORAL ARGUMENT NOT YET SCHEDULED  
No. 16-1005 (and consolidated cases)

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**United States Court of Appeals  
For the District of Columbia Circuit**

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AMERICANS FOR CLEAN ENERGY, *et al.*,  
*Petitioners,*

v.

ENVIRONMENTAL PROTECTION AGENCY &  
REGINA A. MCCARTHY, ADMINISTRATOR  
*Respondents,*

E.I. DU PONT DE NEMOURS & CO., *et al.*,  
*Intervenors.*

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ON PETITIONS FOR REVIEW OF FINAL AGENCY ACTION OF THE UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY, 80 FED. REG. 77,420 (DEC. 14, 2015)

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**BRIEF OF AMICUS CURIAE SMALL RETAILERS COALITION  
IN SUPPORT OF OBLIGATED PARTY PETITIONERS**

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## CORPORATE DISCLOSURE STATEMENT

Pursuant to D.C. Circuit Rule 26.1, Amicus Curiae, the Small Retailers Coalition (“SRC”), discloses the following: SRC is a national trade association with more than 30 members from across the United States. SRC represents the interests of thousands of small, independent petroleum retailers and convenience stores and is dedicated to combating an issue that threatens the future viability of such businesses—the uneven playing field created by the Renewable Fuel Standard. SRC is in the process of becoming a Texas non-profit entity and intends to operate as a tax-exempt organization under the provisions of section 501(c)(6) of the Internal Revenue Code. SRC has no parent corporation, and no publicly-held company owns 10 percent or more of its stock.

September 15, 2016

/s/ Alec Zacaroli

Alec Zacaroli

*Counsel for Amicus Curiae  
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**CERTIFICATE OF PARTIES, RULINGS  
UNDER REVIEW, AND RELATED CASES**

Pursuant to D.C. Circuit Rule 28(a)(1), counsel for SRC certifies the following:

**(A) Parties and Amici**

Except for the SRC, all parties, intervenors, and amici appearing in this Court are, to the best of my knowledge, listed in the Obligated Party Petitioners' Opening Brief Regarding EPA's Refusal to Consider the Appropriate Placement of the Compliance Obligation in the Final Rule, which was filed on September 8, 2016 (Doc. No.1634780).

**(B) Ruling under Review**

The final agency action under review is found at 80 Fed. Reg. 77,420 (Dec. 14, 2015), and is entitled "Renewable Fuel Standard Program: Standards for 2014, 2015, and 2016, and Biomass-Based Diesel Volume for 2017."

**(C) Related Cases**

This case was not previously before this Court or any other court. It has been consolidated with Case Nos. 16-1044, 16-1047, 16-1049, 16-1050, 16-1053, 16-1054, 16-1056. Per the Court's order of May 5, 2016, Case No. 16-1052 (*Alon Refining Krotz Springs, Inc. v. EPA*) was deconsolidated.

September 15, 2016

/s/ Alec Zacaroli

Alec Zacaroli

*Counsel for Amicus Curiae  
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**STATEMENT REGARDING CONSENT TO FILE  
AND SEPARATE BRIEFING**

Pursuant to Fed. R. App. P. 29(a), SRC certifies that it has filed a Motion for Leave to Participate as Amicus Curiae concurrently with this brief. SRC further certifies that it has consulted with the parties. Petitioners American Fuel & Petrochemical Manufacturers, Monroe Energy, LLC, and Valero Energy Corp. and Respondent United States Environmental Protection Agency have consented to SRC's participation. One Petitioner, American Petroleum Institute, has stated that it opposes SRC's participation. Petitioners Americans for Clean Energy and National Biodiesel Board did not object, but reserved their rights to oppose after seeing SRC's motion. No other counsel for any parties or movant-intervenors in the case responded to notice sent to designated or liaison counsel, as applicable, asking whether they consented, objected, or took no position on SRC's proposed participation.

Pursuant to Fed. R. App. P. 29(c)(5), SRC states that no party or party's counsel authored this brief in whole or in part, and that no other person besides amicus curiae contributed money that was intended to fund preparing or submitting the brief.

Pursuant to D.C. Cir. R. 29(d), SRC states that a separate brief is necessary for the following reasons: SRC is a not-for-profit national trade association whose mission is to promote the interests of small retailers in the retail fuel business.



SRC members are thus uniquely positioned to provide the Court with a different perspective from any other party or amicus. Although SRC is aware that a group of businesses and trade associations are seeking to file a joint amici curiae brief in opposition to the respondents in this case, this proposed amici curiae brief is expected to address an unrelated issue (i.e., higher biofuels volume standards) than what is addressed in SRC's amicus brief. Accordingly, SRC anticipates that the focus of this brief is not likely to be duplicated by any other party or amicus and that a separate brief is necessary.

Respectfully submitted,

September 15, 2016

/s/ Alec Zacaroli  
Alec Zacaroli

*Counsel for Amicus Curiae  
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**TABLE OF CONTENTS**

	Page
CORPORATE DISCLOSURE STATEMENT .....	ii
CERTIFICATE OF PARTIES, RULINGS UNDER REVIEW, AND RELATED CASES .....	iii
(A) Parties and Amici .....	iii
(B) Ruling under Review .....	iii
(C) Related Cases .....	iii
STATEMENT REGARDING CONSENT TO FILE AND SEPARATE BRIEFING .....	v
IDENTITY AND INTEREST OF AMICUS CURIAE.....	1
ARGUMENT .....	4
I. The current structure of the point of obligation in the RFS Program is raising the cost of renewable fuel and driving small retailers out of business.....	4
II. The current point-of-obligation requirement is a market constraint contributing to the inadequate supply of renewable fuels that EPA purports to correct in this Final Rule. ....	9
CONCLUSION .....	11
CERTIFICATE OF COMPLIANCE .....	13
CERTIFICATE OF SERVICE .....	14

## TABLE OF AUTHORITIES

	Page(s)
<b>Rules and Regulations</b>	
40 C.F.R. § 80.1406(a)(1) .....	4
80 Fed. Reg. 77,438 .....	9
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James Osborne, <i>Ethanol Credit Spike Divides Gas Stations</i> .....	3
Samantha Oller, <i>Refiners, Small Retailers Fight RIN System</i> .....	6



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**GLOSSARY OF ACRONYNS AND ABBREVIATIONS**

<b>Acronym / Abbreviation</b>	<b>Definition</b>
SRC	Small Retailers Coalition
EPA	United States Environmental Protection Agency
RFS	Renewable Fuel Standard
RIN	Renewable Identification Number
OPP Brief	Obligated Party Petitioner's Opening Brief Regarding EPA's Refusal to Consider the Appropriate Placement of the Compliance Obligation in the Final Rule
E85	High-level ethanol fuel blend containing 51% to 83% ethanol

## IDENTITY AND INTEREST OF AMICUS CURIAE

Amicus curiae, the Small Retailers Coalition (“SRC”), respectfully submits this brief in support of the Obligated Party Petitioners.<sup>1</sup>

SRC represents more than 30 independent, small businesses engaged in the retail sale of gasoline to the public. SRC was formed to raise awareness of a significant threat to the viability of its members: the current structure of the Renewable Fuel Standard (“RFS”) Program, which provides larger fuel retailers with a significant competitive advantage by allowing them to capture the Renewable Identification Number (“RIN”) value of fuel without incurring the obligation under the RFS Program to supply renewable fuels. This is a threat that, even now, only a handful of small retailers have come to fully appreciate. SRC is continuing to grow its membership as more retailers become aware of the issue.<sup>2</sup> In the interim, as small retailers are becoming more aware of the uneven playing

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<sup>1</sup> The Obligated Party Petitioners are American Fuel & Petrochemical Manufacturers; Alon Refining Krotz Springs, Inc.; American Refining Group, Inc.; Calumet Specialty Products Partners, L.P.; Ergon-West Virginia, Inc.; Hunt Refining Company; Lion Oil Company; Placid Refining Company; U.S. Oil & Refining Co.; Wyoming Refining Company; Monroe Energy, LLC; and Valero Energy Corp.

<sup>2</sup> Because SRC was recently formed, SRC was not able to submit formal comments to the rule at issue here. SRC, however, did submit comments to the Docket for the Proposed Renewable Fuel Standards for 2017, and the Biomass-Based Volume for 2018. *See, e.g.*, Bill Douglass, Chairman, Douglass Distributing, Comment Letter on Proposed 2017 RFS (July 28, 2016) (Docket No. EPA-HQ-OAR-2016-0004-3574-A2).



field in which they are forced to compete, many have filed comments with EPA. These comments raise concerns that small retailers are being driven out of the market by their larger, more integrated competitors who can sell RINs to supplement their income.<sup>3</sup>

Although small gasoline retailers are not regulated under the RFS Program, SRC's members are an integral part of the fuel distribution system necessary for the success of the Program, and are currently directly and adversely impacted by it. SRC's members, along with all small retailers, are essential to the system because in the aggregate they comprise approximately 65 percent of the nation's retail gas business. Small retailers thus serve millions of customers with gasoline and renewable fuels, thereby helping supply renewable fuels to a vast market across the country and maintaining the competition necessary to ensure the efficient, even distribution of gasoline and diesel.

Currently, however, small retailers are adversely impacted by the RFS Program because of the requirement that places the point of obligation for

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<sup>3</sup> See, e.g., Bruce W. Heine, Magellan Midstream Partners, Comment on Proposed 2017 RFS (July 11, 2016) (Docket No. EPA-HQ-OAR-2016-0004-2695); Joe Jobe, Rock House Advisors, Comment on Proposed 2017 RFS (July 10, 2016) (Docket No. EPA-HQ-OAR-2016-0004-1717); E. Harvey Steinhagen III, PetroTex Fuels, Inc., Comment on Proposed 2017 RFS (July 15, 2016) (Docket No. EPA-HQ-OAR-2016-0004-3546); Michael C. Kelly, Gordon Petroleum, Comment on Proposed 2017 RFS (Aug. 1, 2016) (Docket No. EPA-HQ-OAR-2016-0004-3557); Shujat Swati, Swati Enterprises, Inc., Comment on Proposed 2017 RFS Rule (July 29, 2016) (Docket No. EPA-HQ-OAR-2016-0004-3573).

compliance with renewable fuel mandates on fuel importers and refiners, rather than blenders. This requirement means that large fuel retailers with the capability of blending gasoline or diesel with a renewable fuel at the rack can capture the RIN from the renewable fuel source.<sup>4</sup> Because these large retailers are not obligated parties under the RFS, they are then free to sell the RIN and pocket the revenue. Small retailers, in contrast, are unable to blend fuel because they lack the necessary infrastructure, and are forced to buy the finished product directly from blenders.<sup>5</sup> The result is that large retailers are making a windfall from the sale of RINs, are artificially lowering the price of gasoline to undercut small retailers, and are well on their way to running small retailers out of business altogether.<sup>6</sup>

Accordingly, SRC submits this amicus brief in support of the request to grant the Petition for Review and remand for EPA's consideration of the point-of-

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<sup>4</sup> The "rack" (also called terminal or terminal rack) is the point at which fuel is prepared and distributed into the commercial market. It is where fuels are blended to meet the RFS and other requirements, and are then distributed into commerce.

<sup>5</sup> Although refiners could blend fuel at the time of refining and sell the same blended gasoline to both large and small retailers, pipelines will not allow ethanol-blended products in the pipeline for various reasons.

<sup>6</sup> See *RINs Debate Touches Off Concern on Wall Street*, TEXAS FUEL & FOOD ASSOC. (Aug. 10, 2016), <https://txfoodandfuel.org/2016/08/10/rins-debate-touches-off-concern-on-wall-street/> ("Goldman Sachs and Credit Suisse 'are advising investors to avoid companies with high RIN exposure and to buy shares in large retail and distribution chains.'"); James Osborne, *Ethanol Credit Spike Divides Gas Stations*, FUELFIX (Aug. 24, 2016) ("Between 1994 and 2015 the number of filling stations fell from more than 200,000 to about 150,000.").



obligation definition under the current program. Only SRC is in a position to adequately represent to the Court the nature and extent of this impact on its members, as well as on all small fuel retailers.

### ARGUMENT

EPA refused to address the point-of-obligation definition in the RFS regulations through the promulgation of the Renewable Fuel Standard Program: Standards for 2014, 2015, and 2016, and Biomass-Based Diesel Volume for 2017. This refusal will have a devastating impact on the nation's small gasoline retailers and will further undermine the long-term viability of the RFS Program.<sup>7</sup>

**I. The current structure of the point of obligation in the RFS Program is raising the cost of renewable fuel and driving small retailers out of business.**

As noted in the brief filed by the Obligated Party Petitioners, EPA has already conceded that the RIN market is not operating as intended, and is driving up prices of renewable fuels for both obligated parties and consumers. OPP Br. at 9-10; *see also* OPP Br. at 12-13. Indeed, as the Obligated Party Petitioners have

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<sup>7</sup> SRC supports the positions set forth in the Obligated Party Petitioner's Opening Brief Regarding EPA's Refusal to Consider the Appropriate Placement of the Compliance Obligation in the Final Rule ("OPP Brief"). In particular, SRC supports, for all of the reasons set forth in the OPP Brief, the Obligated Party Petitioner's position that EPA was obligated to address the point-of-obligation definition contained in the RFS regulations through this rulemaking. SRC will not repeat those arguments here, but rather wishes to explain why this obligation on the part of the agency was particularly important for small retailers, and why the impact on small retailers further undermines the long term viability of the RFS Program.



told EPA and this Court, “the regulatory definition of ‘obligated party’ is a root cause of the RIN system’s inefficiency, because it allows unobligated blenders to profit from RINs rather than passing their value through to retail customers in the form of subsidized E85 prices.” OPP Br. at 31. That structure is particularly devastating to the nation’s small gasoline retailers because it provides large fuel retailers with the ability to artificially undercut the market price of gas at the pump, capture additional market share, and ultimately drive small retailers out of business altogether.

Under the current system, the point of obligation for compliance with renewable fuel mandates is placed on fuel importers and refiners, rather than blenders. 40 C.F.R. § 80.1406(a)(1). This means that anyone with the capability of blending gasoline or diesel with a renewable fuel at the rack can capture the RIN from the renewable fuel source, and then sell the RIN in the market because they are not obligated parties under the RFS Program.<sup>8</sup> Large fuel retailers across the country are taking advantage of this structure. Those with the capability to blend fuel are buying gasoline from merchant refiners (this fuel comes with no obligation), buying ethanol (which comes with a RIN), blending the two, and

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<sup>8</sup> Harry Simpson, President, Crimson Renewable Energy, Comment on Proposed 2016 RFS Rule at 3-6 (July 25, 2015) (Docket No. EPA-HQ-OAR-2015-0111-1823-A1).

capturing the RIN.<sup>9</sup> The retailers then sell the RIN in the market or back to the refiner, which needs the RIN to meet its obligation.<sup>10</sup>

This is not a hypothetical—it is occurring in the market today—and large retailers are increasingly formulating business plans around selling the RIN in lieu of selling gasoline. For example, in a recent earnings call, executives from Couche-Tard<sup>11</sup> were highlighting positive earnings by explaining how large retailers have access to RINs that give them a market advantage.<sup>12</sup> The Chief Financial Officer started by saying:

We think our scale and procurement allows us to buy product as well as anyone, we think our—we got generally broader access to RINs in the U.S. than most of our competition. So as RINs increase in value we think that widens our competitive advantage and then finally we focus on the Categories. So we think we were widening what we believe it's a key competitive and sustainable advantage in the fuel space.

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<sup>9</sup> Chris Prentice, *EPA Should Change Biofuels Program to Help Small Fuel Retailers: Letter*, REUTERS (Aug. 1, 2016, 2:30 PM), <http://www.reuters.com/article/us-usa-biofuels-retailers-idUSKCN10C2ZX>.

<sup>10</sup> See George Damiris, President & CEO, HollyFrontier Corp. Earnings Call Transcript (May 4, 2016), <http://seekingalpha.com/article/3971326-hollyfrontier-hfc-george-j-damiris-q1-2016-results-earnings-call-transcript>.

<sup>11</sup> Couche-Tard is more commonly known as Circle-K.

<sup>12</sup> See Brian Hannash, CEO, Alimentation Couche-Tard Inc. Q1 2017 Earnings Conference Call (Aug. 30, 2016), <http://seekingalpha.com/article/4003201-alimentation-couche-tards-ancuf-ceo-brian-hannasch-q1-2017-results-earnings-call-transcript>.



Thereafter, the President and CEO stated, “as RIN values increase, we think the advantages we have of having access to those RINs widens our supply advantage vis-à-vis competition, so in general we do like having a higher value RIN.”<sup>13</sup>

All of this is devastating the nation’s small gasoline retailers, who do not have the ability to blend fuel and separate RINs for subsequent sale.<sup>14</sup> Not only are large retailers able to enjoy an additional revenue stream not available to small retailers, but large retailers are now consistently underpricing gasoline at the pump in order to drive small retailers out of business.<sup>15</sup> RINs are currently trading at approximately 88 cents per gallon (8.8cpg on a blended gallon), enabling large retailers to cut the price of gasoline at the pump by 8 to 15 cents per gallon and still earn a profit.<sup>16</sup> This has a huge impact on small retailers, as consumers will “price

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<sup>13</sup> *Id.*

<sup>14</sup> See Samantha Oller, *Refiners, Small Retailers Fight RIN System*, CSP DAILY NEWS (Aug. 18, 2016), <http://www.cspdailynews.com/fuels-news-prices-analysis/fuels-analysis/articles/refiners-small-retailers-fight-rin-system>.

<sup>15</sup> See Douglass, *supra* note 2.

<sup>16</sup> A recent SEC filing from a large retailer, Casey’s General Store, reports:

The fuel margin was up about \$0.02 per gallon from the first quarter last year, due to a decline in the wholesale cost of fuel and a favorable environment for renewal energy credits resulting in a fuel margin of \$0.195 per gallon for the quarter. During this time, we sold approximately 17.9 million RINs at an average price of \$0.82. This represented about \$0.027 per-gallon benefit to the fuel margin.

See CASEY’S GENERAL STORES, INC., FORM 8-K (Sep. 7, 2016), *available at* <http://secfilings.nasdaq.com/filingFrameset.asp?FilingID=11583075>.



shop while they drive.” meaning that as many as 64 percent of consumers will “take a left turn across a busy street” or “drive 5 miles out of their way” to save \$0.05 a gallon on gas.<sup>17</sup>

If large retailers that profit from the RIN are allowed to undercut small retailers by 5 to 14 cents a gallon and still earn a profit, small retailers will be completely shut out of the market, and consumers will be left with only the large retailers to provide gasoline. This reduces choice and fair price competition for the consumer, and results in fewer retail outlets to supply fuel to the market.<sup>18</sup> It also undermines the RFS Program. The goal of the program is to incentivize investment in infrastructure that can provide consumers with gasoline that contains higher ethanol blends like E85. As long as large retailers can profit from the sale of RINs, they have no incentive to invest in any additional infrastructure to deliver higher ethanol blends. EPA recognizes that “the RIN is currently an inefficient mechanism for reducing the price for higher level ethanol blends at retail, and therefore unlikely to be able to significantly impact the supply of ethanol in the United States in 2016.” 80 Fed. Reg. at 77,457.

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<sup>17</sup> *Even at \$2, The Gas Price Still Dominates Purchasing Decisions*, NACS ONLINE (Mar. 7, 2016), <http://www.nacsonline.com/YourBusiness/FuelsCenter/Basics/Articles/Pages/Even-at-2-The-Gas-Price-Still-Dominates-Purchasing-Decisions.aspx>.

<sup>18</sup> Once competition is eliminated, however, there is no incentive (or price competition) to keep prices low.

A recent study by Dr. Bernard L. Weinstein, Associate Director, Southern Methodist University Maguire Energy Institute, supports these conclusions:

The bias against small retailers has serious implications for their long-term survival because the current regulatory regime governing RINs trading allows large fuel marketers and large retailers to gain revenues and a competitive advantage over small retailers. Reports indicate that large retailers are using the RIN profit stream for retail expansion and acquiring a larger share of a limited market. Small retailers are losing both sales volume and stores to large retailers. In other words, small retailers aren't just less profitable but they are going out of business due to their growing inability to compete with large retailers. As a result, the demise of small "mom-and-pop" fueling stations has accelerated, with more than 12,000 closing since 2007.<sup>19</sup>

EPA's refusal to consider the effect of the point of obligation requirement on small retailers thus provides an additional reason to grant the petition for review.

**II. The current point-of-obligation requirement is a market constraint contributing to the inadequate supply of renewable fuels that EPA purports to correct in this Final Rule.**

In the Final Rule under review, EPA recognizes that Congress imposed a time-critical obligation on the agency to increase the volumes of renewable fuels into the marketplace so that they can be used in the transportation sector. EPA purports to take this obligation seriously in the rulemaking, stating that it is obligated to "consider the full range of constraints, including legal, fuel

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<sup>19</sup> Dr. Bernard L. Weinstein, *Renewable Identification Numbers (RINS) Trading Under the Renewable Fuels Program: Unintended Consequences for Small Retailers*, SMU MAGUIRE ENERGY INST. (Aug. 2016), <http://www.smu.edu/Cox/CentersAndInstitutes/MaguireEnergyInstitute/PapersPub> §.



infrastructure and other constraints, that could result in an inadequate supply of renewable fuels to consumers.” 80 Fed. Reg. at 77,438. EPA further emphasizes that, “[u]nder this interpretation, we would not limit ourselves to consideration of the capacity to produce or import renewable fuels but would also consider practical and legal constraints affecting the volume of qualifying renewable fuel supplied to the ultimate consumer.” *Id.* Yet, EPA’s placement of the current point of obligation is a practical and legal constraint that affects the volume of renewable fuels to the consumer.

The system provides an incentive to large retailers to sell RINs, rather than develop the fuel infrastructure necessary to implement the RFS. In fact, the system as designed actually encourages large retailers to maximize revenue by driving up the price of RINs.<sup>20</sup> RIN prices increase when the RINs are in short supply, so large retailers have an incentive to limit biofuel blending and keep E85 out of the market to maintain high RIN prices. In addition, when RIN prices are high, the large retailers have more room to manipulate the price of gas per gallon by subsidizing their business with RIN revenue.<sup>21</sup> This is the exact opposite of the

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<sup>20</sup> See Damiris, *supra* note 10; Hannash, *supra* note 12; see CASEY’S STORE 8-K, *supra* note 16.

<sup>21</sup> According to a Goldman Sach’s earning call, this rule will result in “substantial tightening in the RIN markets” and that “inventories of the credits to fall from early 2016 inventories that represent 1.87 billion gallons (7.1 billion liters) of biofuels, down by 484 million gallons this year and another 600 million



system EPA should be working to grow. As EPA has recognized, one of its statutory obligations is to distribute the point of obligations more effectively to ensure the success of the RFS Program. In its Final Rule, the agency stated:

EPA agrees that its approach to interpreting the term ‘inadequate domestic supply’ should be consistent with the objective of the statute to grow renewable fuel use *over time by placing appropriate pressure on all stakeholders to act within their spheres of influence* to increase biofuel production and use of renewable fuels.

80 Fed. Reg. at 77,439 (emphasis added); OPP Br. at 32.

But rather than placing appropriate pressure on all stakeholders (most notably, large retailers), EPA has created what one leading investor called a “rigged system” enabling large retailers to game the system, profiting from RINs and pushing small retailers out of the market.<sup>22</sup> This will inevitably result in an inadequate domestic supply of renewable fuel to the ultimate consumer—the very issue that EPA was required—but refused—to address.

## CONCLUSION

EPA is required by law to consider the practical and legal constraints affecting the availability of renewable fuel to the consumer. The current point of obligation is such a constraint because it enables large gasoline retailers to profit

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next year.” *Prices of U.S. Biofuels Credits Jump on Supply Worries*, REUTERS (Sept. 15, 2016), <http://af.reuters.com/article/idAFL1N19L0RJ>.

<sup>22</sup> *Icahn Urges EPA to Change Renewable Fuel Credit Market*, CNBC (Aug. 16, 2016, 6:56 AM), <http://www.cnbc.com/2016/08/16/icahn-urges-epa-to-change-renewable-fuel-credit-market.html>.

from RINs and push small retailers out of the market. Yet, EPA refused even to address this issue.

Accordingly, SRC respectfully requests that the Court grant the Petition and direct EPA to consider the point of obligation requirement and whether to amend the point of obligation to the point of blending. This will eliminate the uneven playing field that allows large retailers to profit from RINs and create a market where all retailers are incentivized to accommodate the larger volumes of renewables contemplated by the RFS.

Respectfully submitted,

September 15, 2016

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### CERTIFICATE OF COMPLIANCE

In accordance with Rule 32(a)(7)(C) of the Federal Rules of Appellate Procedure, I hereby certify as follows:

1. This brief complies with the type-volume limitations of Fed. R. App. P 29(d) because it contains 2,976 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(a)(7)(B)(iii).
2. This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because it has been prepared in proportionally spaced typeface using Microsoft Word in Times New Roman 14-point font.

September 15, 2016

/s/ Alec Zacaroli

Alec Zacaroli

*Counsel for Amicus Curiae  
Small Retailers Coalition*



**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2016, the foregoing Brief of Amicus Curiae Small Retailers Coalition in Support of Obligated Party Petitioners was served upon all counsel of record electronically through the Court's CM/ECF system.

September 15, 2016

/s/ Alec Zacaroli

Alec Zacaroli

*Counsel for Amicus Curiae  
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Convenience Store News

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## Texas Continues to Lead U.S. C-store Count

### Industry finds fewer single-store owners are selling fuel.

February 3, 2017, 01:43 pm



ALEXANDRIA, Va. — The U.S. convenience store count has hit a record number, with Texas leading the way with more than one in 10 locations.

According to the 2017 NACS/Nielsen Convenience Industry Store Count, there were 154,535 c-stores as of Dec. 31, a 0.2-percent increase from the year prior. That equals 340 additional stores.

The industry store count has increased by 63 percent over the last three decades. At year-end 1986, the c-store count was 95,000 stores, at year-end 1996 the store count was 104,600 stores and at year-end 2006 the store count was 145,119 stores.

Over that time frame, there have only been five times when the store count did not set a record, the latest being year-end 2008 and 2009 during the Great Recession, NACS, the Association for Convenience & Fuel Retailing said.

"Nielsen data shows that the U.S. convenience store channel continues to be an industry of opportunity," said Rob Hill, executive vice president of retail services at Nielsen. "The current consumer climate has created favorable conditions for c-store sales growth, contributing to a positive, long-term outlook."

"Nielsen understands the importance of the convenience channel and is committed to accurately track convenience store growth for our partners and clients, both chains and independent stores," Hill added.

Compared to the other retail channels Nielsen tracks, convenience stores account for more than one third (34.1 percent) of all outlets in the United States. In addition, the convenience store count alone is 25 percent higher than the combined store counts of superettes, supermarket and supercenters (51,191 stores), drug stores (43,636 stores) and dollar stores (28,832 stores).

Overall, 80.1 percent of convenience stores (123,807) sell motor fuels, a decrease of 0.6 percent (or 567 stores) from 2016, with the single-store motor fuel segment dropping by 604 stores.

"This decline could be something to watch. It's likely that some stores have stopped selling gas for reasons such as the cost of PCI compliance, competition from [quick-service restaurants], as well as industry consolidation," said Bob Swanson, director of research and statistics for NACS.

The convenience retailing industry continues to be dominated by single-store operators, which account for 63.1 percent of all locations (97,504 stores total) and 42.6 percent of store growth last year.

A small operator himself, NACS 2016-17 Chairman Rahim Budhwani, CEO of Hoover Ala.-based 6040 LLC, stated, "Our continued annual growth in store count shows that our industry's core offer of convenience strongly resonates with time-starved customers, while our channel continues to innovate with new formats and offers to stay relevant and vibrant."

Among the states, Texas continues to lead in store count with 15,671 stores. The rest of the top 10 states for convenience stores are: California (11,774), Florida (9,930), New York (8,570), Georgia (6,761), North Carolina (6,306), Ohio (5,635), Michigan (4,833), Pennsylvania (4,787), and Illinois (4,737).

As overall growth in the channel was fairly small during 2016, 23 states experienced declines in total store count from the prior year. The bottom three states in terms of store count are: Alaska (217 stores), Delaware (348), and Wyoming (354).

Alexandria-based NACS has 2,100 retailer and 1,750 supplier members from more than 50 countries.

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## TRUCK STOPS: REVIEWS, TRIVIA AND FEATURES OF THE NORTH AMERICAN CHAINS

🕒 AUGUST 8, 2016 BY 🧑 CATMAC22\* 💬 [LEAVE A COMMENT](#)

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Truck stops are a truck driver's home away from home. They provide conveniences for truckers when 'on the road'.

It's not possible to just whip a truck and trailer into just any restaurant or grocery store you should see along the way.

Big trucks need lots and lots of room to maneuver safely and park and that usually requires the space that a well appointed stop provides. And that's where the truck stops come in.

Ask any trucker and they'll tell you there can never be too many truck stops. In certain areas of the U.S. and especially in Canada, there's a serious shortage of them. Centers often tend to be too small to service large numbers of drivers and their rigs.





## BITS AND PIECES OF TRIVIA

- **Major chains** include TA, Pilot, Petro, Flying J, Bosselman's and Loves Truck Stop. There's also plenty of independents, too.
- Pilot bought out 'Flying J'.
- T.A. and Petro are partnered.
- The list of independent truck stops seems to dwindle year after year. It's **rough for them** because they can't offer the great benefits and perks as the major chains, such as fuel discounts, point system cards, discounted deals on tires, truck parts etc.

With a points card, you could fuel up in Wyoming in the morning, get points or a coupon for a free shower when you stop in the evening in Nebraska....something the small independents just aren't able to offer.

- Many stops have **chain restaurants** which are take-out, such as Taco Bell, Arby's McDonald's, Wendy's or Subway. These restaurants are **privately owned and operated**, as the costs of running their own restaurant in some locations, can be prohibitive.



## MUST-HAVE'S IN A GOOD TRUCK STOP

These are absolute necessary standards of good truck stops.

*If the place doesn't meet these standards, I wouldn't recommend it to anyone, end of story.*

Truckers deserve the best. They put in long hard days and a very tough, stressful job. The very least they can expect from a good facility is **cleanliness and decent, not-overpriced food**.

If you've encountered any place that offers anything less, ***don't ever give them your business again if you can help it.***

This trucking industry doesn't pay enough money, for any trucker to waste his/her money on food or service that isn't up to par.

Truckers work hard for their money, and if the facility doesn't show the respect drivers deserve by providing the basics, ***they don't deserve the business.***



1. **Cleanliness.** Must be clean restrooms, shower facilities and restaurant.
2. **Parking.** There's not much value in a truck stop, if there's limited parking!
3. **Location.** A safe, convenient location to major cities and highways.
4. **Food.** Good 'well-priced' food. No trucker wants to 'roll the dice' and eat lousy food when on the road. Petros have a decent salad bar, reasonable priced and consistent quality in their restaurants.

## FEATURES OF THE MAJOR CHAINS

- TV and game rooms
- Chrome and parts shop
- Laundry facilities
- Showers
- Mobile phone outlet
- CB repair and retail shop
- Hair salon
- Truck and trailer repair shop
- Fuel facilities with point system
- Restaurants. Sit-in, take-out, grocery items, snack items, as well as restaurants with 'healthy food choices'
- Wireless internet connections
- Discounts and deals for frequent users on point system
- Good quality on site overnight accommodations
- Permit services
- Cat scales
- Assorted other retail specialty shops such as gift stores, candy shop etc.



## PROS AND CONS OF CHAIN TRUCK STOPS

### T.A.

**Pros** — Most of their **restaurants** are decent. -Repair shop facilities are good. **Cons** — **Inconsistent service** from the various locations. Some locations are run down and old, in **need of renovation and up-dates** to facilities. Loves

### Petro

**Pros**—Very good **restaurant facilities**. This is what makes this chain so popular.

Very **roomy parking** lots. This is also a nice perk for truckers who like to get their exercise, power walking around the parking lot. **Full service** for everything a

**Pros – Clean facilities and restrooms.**

Well-priced diesel fuel

**Points/discount program.****Cons – Fast food service**

only, no eat-in facilities

Limited number of locations

truck driver needs when on the road. Walking trails and

'StayFit Fitness Rooms' **Cons –** Some say fuel is an extra cent per gallon..... really, to offset all the great convenient services they offer.

### Pilot

**Pros –** Very large chain in the U.S., some locations in Canada, competitive fuel prices, lots of well-situated locations

**Cons–** Parking lots are often too small



### Bosselman Travel Centers

Good repair shops, restaurants, decent food, clean and efficient service

### Flying J

**Pros –** Well priced fuel

**Cons –** Parking lots are not well set up, parking spaces need to be bigger.

### Smart Trucking Tip.... Finding Good Truck Stops!

If you're in an area that is unfamiliar and are looking for a decent place to stop, *get on your CB radio and ask the local truckers where the best place is!*

Smart Trucking Home > Life of a Trucker

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### ABOUT THE AUTHOR



Hello. I'm Catherine, the editor at Smart Trucking. More About Me.

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# CONSOLIDATION IN THE CONVENIENCE & RETAIL FUEL SECTOR: STRATEGIES FOR CAPTURING VALUE A COMMERCIAL BANKING PERSPECTIVE



The traditionally fragmented convenience and retail fuel industry is seeing a spate of consolidation activity from both private equity and strategic buyers. While 2014 was one of the most active years on record for C-Store mergers and acquisitions, it looks like velocity is increasing during 2015, with some experts predicting that 30 to 40% of C-Store assets will be in the hands of just a half dozen players within the next 12 to 24 months.<sup>1</sup> Market factors – such as available debt financing, corporate liquidity from rising profits, historically low interest rates (despite the uncertainty of future hikes) and shareholder demand for growth – continue to propel deal activity.

## Sample of Recent Activity<sup>2,3,4,5,6</sup>

Recent PE Sales	Recent Strategic Acquisitions
<ul style="list-style-type: none"> <li>• <b>1Q2015</b> Sun Capital sells remaining C-Store portfolio (163 locations) to GPM</li> <li>• <b>4Q2013</b> Catterton Partners consolidated and completed the sale of 5,000 Mid-Atlantic Convenience Stores ("MACS") to an affiliate of Sunoco</li> <li>• <b>4Q2013</b> ACON and TPG sold interests in Northern Tier Energy, an independent downstream energy company with refining also operating 163 convenience stores and supporting 74 franchised convenience stores</li> </ul>	<ul style="list-style-type: none"> <li>• <b>1Q2015</b> CrossAmerica acquired Erickson Oil Products (64 locations)</li> <li>• <b>1Q2015</b> Petroleum Marketing Group acquired 37 of Mid-Atlantic Petroleum Properties' gas stations and convenience stores</li> <li>• <b>1Q2015</b> TravelCenters of America acquired 26 Best Oil locations</li> <li>• <b>2Q2014</b> Speedway doubled its size with the acquisition of Hess Retail Holdings (1,256 stores in 16 states), bringing its network to more than 2,700 stores</li> </ul>

Despite red-hot M&A activity in this sector over the past five years, single-store operators still account for 63% of that total and the engine for store growth<sup>7</sup> – meaning substantial consolidation opportunity exists for interested buyers. And given the latest M&A flurry, along with continued positive market trends in the sector, the interest is growing.

## WHY ALL THE FOCUS ON FOOD AND FUEL?

Americans are covering twice as many miles per year as we did in 1980.<sup>8</sup> Hours spent commuting, running errands and sitting in traffic are accounting for an increasing share of the day, further compressed by busy professional and family schedules. The need to increase the efficiency of everyday tasks has led consumers to seek outlets combining key services: part grocery, part fast food outlet, part coffee stop and, frequently, part gas station. Easily accessed along high-traffic routes and increasingly offering private label and fresh foods, convenience stores selling motor fuels have become incredibly attractive assets to both consumers and investors. For both private equity firms and experienced operators seeking to expand, the universe of convenience stores selling motor fuels is significant – 83.5% of all convenience stores or 127,588 locations – and the opportunity fruitful.<sup>9</sup>

## WALL STREET IS TAKING NOTICE

Traditionally, these stores have been owned by independent, single-store operators. In fact, the top 10 chains – including 7-Eleven, Shell, Exxon and BP – account for only 25% of the market.<sup>10</sup> Nearly a decade ago, Wall Street began taking notice, and private equity firms started investing in the sector.





One of the first deals to signal this trend was Sun Capital's 2006 acquisition of Marsh Super Markets, with a bonus of a C-Store division of 154 stores (mostly Village Pantry). The private equity group would go on to actively grow in the convenience and retail fuel channel:

- Acquired the 122-unit Worsley business in March 2008
- Followed two months later with Li'l Cricket's 88 stores
- United its Midwestern and Southeastern divisions into the VPS Convenience Store Group in spring 2009

In February 2015, Sun Capital sold off all of its remaining C-Store assets, exiting a nearly decade-long investment in the channel<sup>11</sup> and releasing significant inventory for interested buyers.

## CHALLENGES TO OPERATE

While C-Stores bring enormous opportunity – growing consumer appeal, high EBITDA and potential for growth through expansion – it's a complex, fast-moving business rife with challenges. C-Stores need to keep up with changing customer preferences, volatile gas prices, legal and regulatory compliance obligations, around-the-clock staffing, communication and adherence to best practices between stores – to name just a few.

Operators who have been doing this for decades leverage their experience to their advantage and for profit, particularly during the consolidation and expansion phases. Private equity owners unfamiliar with the operational intensity associated with this sector are typically not as successful in turning a profit, resulting in discounted exits.

## AN OPPORTUNITY FOR TRADITIONAL OPERATORS

Because private equity interest validates the segment through high multiples that Wall Street appears to have an appetite for, traditional operators are faced with a decision. Depending on their goals, operators need to be mindful of the best way to participate in this current landscape:

*Should they prepare to buy, sell or defend their position?*

- **Prepare to buy:** The opportunity is significant, with more than 97,000 single-store convenience operators in-market (or 63% of the 152,794 store total). A key consideration will be in evaluating whether target locations have the market and operational characteristics that will fit with buyers' strategies and practices. But, more importantly, is there sufficient capital to finance an acquisition plan?
- **Prepare to sell:** If financials are sound, numerous buyers are eager to talk terms. Sellers are in a very favorable position given the number of private equity firms looking to invest, the master limited partnerships (MLPs) flush with cash due to different tax requirements and, of course, the traditional operators looking to expand.

- **Prepare to defend:** For operators not ready to acquire or position for sale, maintaining financial fitness while staying relevant in a constantly changing marketplace is crucial. Defending market share may require capital improvements, such as a remodel, to expand and diversify inventory. Or transitioning to paperless payables processes to optimize liquidity. Or enhancing POS options and security with early and innovative approaches; beyond EMV technology this could include near field communication (NFC) payments solutions.

Whether positioning to buy, sell or defend market share, savvy and experienced operators have the opportunity to smartly invest today in order to capture value and drive future growth in the context of acquisition and exit cycles.

### CITIZENS CONVENIENCE & RETAIL FUEL FINANCE TEAM

As a top national lender to multi-site operators, Citizens Convenience & Retail Fuel Finance offers a deep understanding of your industry and the challenges you face, including margin pressure, volatile pricing and unpredictable cash flow. Supporting a range of deal sizes and needs, for both retail and wholesale operators, our experienced bankers are committed to achieving your immediate goals and furthering your long-term success. For more information on our expertise and how we can put it to work for you, please visit [citizensretailfuel.com](http://citizensretailfuel.com).

### ABOUT CITIZENS COMMERCIAL BANKING

Citizens Commercial Banking, one of the nation's leading commercial banking institutions, is a division of Citizens Financial Group Inc., one of the nation's oldest and largest financial institutions, with \$137.3 billion in assets as of June 30, 2015. Headquartered in Providence, Rhode Island, the company has offices in 20 states. We help corporations, municipalities, real estate investors and non-profits build value. We partner with clients to create customized financial solutions to achieve their objectives, drawing from our comprehensive array of services including lending and deposits, treasury management, capital markets, foreign exchange, interest rate risk management, leasing, asset-based lending, specialty and global trade finance.

Citizens operates via subsidiaries Citizens Bank, N.A., and Citizens Bank of Pennsylvania. Additional information about Citizens and its full line of products and services can be found at [citizensbank.com/commercial](http://citizensbank.com/commercial).

- <sup>1</sup> "Consolidation Nation: This year's Top 20 Growth Chains reflect a busy year on the M&A front." Convenience Store News, March 2015
- <sup>2</sup> "Can Anything Cool Down M&A in the C-Store Industry?," Convenience Store News, April 7, 2015
- <sup>3</sup> "GPM Picks Up Other Half of VPS", CSP Daily News, February 22, 2015
- <sup>4</sup> "Northern Tier Energy Announces Sale of its General Partner by ACON Investments and TPG", PR Newswire, November 12, 2013
- <sup>5</sup> "Catterton Partners Completes Sale Of Mid-Atlantic Convenience Stores To A Sunoco Affiliate", PR Newswire, October 3, 2013
- <sup>6</sup> "Speedway to expand with \$2.8B deal," Dayton Daily News, May 23, 2014
- <sup>7</sup> 2015 NACS/Nielsen Convenience Industry Store Count
- <sup>8</sup> Department of Transportation Federal Highway Administration 2010 Highway Statistics: Vehicle Registrations, Fuel Consumption, and Vehicle Miles of Travel as Indices
- <sup>9</sup> 2015 NACS/Nielsen Convenience Industry Store Count
- <sup>10</sup> "What Consolidation?," Convenience Store News, July 2013
- <sup>11</sup> "VPS CEO hopes to stay in industry following sale of rest of VPS to GPM", CSP.net, February 12, 2015



# Renewable Fuel Incentives: Estimation of Large Retailers' Margins

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## Executive Summary

The US Environmental Protection Agency ("EPA") has recently been confronted with the argument that large fuel retailers do not benefit from the renewable identification number ("RIN") market through windfall profits or increased margins compared to others in the fuel marketing chain. This report utilizes an Estimated Margin Indicator ("EMI") with inputs from several relevant databases to test this premise with respect to two large unbranded retailers that are large players in the RIN market. While these two large fuel retailers realize margins that exceed average convenience store levels by approximately double, small retailers do not have the ability to enjoy the same excess margins.

## I. Background

This paper utilizes a daily snapshot tool known as an Estimated Margin Indicator ("EMI") to ascertain fuel margins for two large fuel retailers. This method starts with the retail price for a given fuel that is comparable to nearby small retailers. The costs and profits to both the large and the small fuel retailers are embedded in this retail price. The EMI then calculates the additional margin realized by large retailers as a result of the renewable identification number ("RIN") market. This paper focuses on Pilot/Flying J and Loves because of the considerable amount of information they make public, especially in relation to the over 1,050 stores nationwide. As a consultant with vast experience in the petroleum and renewables industries, I believe the EMI model—and the specific conclusions herein—to be generally applicable to other entities which have similar operations.

By way of background, Pilot/Flying J is one of the largest North American retail distribution companies that started operations in 1958. The first full-service facility opened in Ogden, Utah, in 1979. The Conoco/Flying J joint venture in 1991 was a catalyst that led the transformation of the company into its current market brand. At the time of this paper, the company operates 710 facilities.

The other entity examined, Loves, is a Musket held company, which is a large retailer of petroleum products. Loves operates in a similar manner to Pilot/Flying J. They also publish daily fuel prices for all locations. Because of the Musket relationship, Loves is also a blender of renewables in the marketplace. At the time of this paper, they operate 351 of their own branded stations.

Both entities' data were input into the EMI model with data from various other inputs. Specifically, data were taken from the Chicago Board of Trade ("CBOT"), the New York Mercantile Exchange ("NYMEX"), the Department of Transportation ("DOT"), the Energy Information Agency ("EIA"), the Environmental Protection Agency ("EPA"), the Iowa State University Ethanol and Biodiesel Profit Tools, the Internal Revenue Service ("IRS"), the Oil and Petroleum Information Service ("OPIS"), and various state tax and revenue agencies.

The EMI, as shown in Appendix One, graphically detailed in Appendix Two, and explained step-by-step in Appendix Three, demonstrates that Pilot/Flying J and Love's margins exceed the National Association of Convenience Stores ("NACS") average of \$.189 cents by nearly double. This is because these companies enjoy a strong financial advantage over companies that distribute and sell petroleum fuels. The ultimate effect could be selective losses in market share for smaller, less sophisticated market participants. Small retailers are placed at a serious competitive disadvantage because they do not have access to the excess margins enjoyed by Pilot/Flying J, Loves, and other large fuel retailers.



## II. Key Findings

While the entire EMI is available in Appendix One, a summary of the results for both Pilot/Flying J and Loves follow. In both instances, these entities' combined gross profits are almost twice as high as the national average. Furthermore, a pass-through to customers did not occur, as additional RIN-derived margins are retained by large fuel retailers as profits. To the contrary, small fuel retailers, which do not have access to similar margins, are likely to lose market share as a result. If the Environmental Protection Agency ("EPA") were to alter the point-of-obligation under the Renewable Fuel Standard ("RFS"), small fuel retailers would be considerably more likely to be able to achieve price parity with large fuel retailers and sustain operations in local markets that continue to thrive based in substantial part on robust retail competition.

### a) Pilot Flying J

The EMI derives gross margins for E-10 blends and various biodiesel blends, along with gross combined margins across both products.

For E-10 blends, the EMI finds that on December 21, 2016, the average margin per gallon was \$0.1515 for all Pilot/Flying J retail outlets. Across the nation and depending on location, stores reported ranges between -\$0.1265 and \$0.5190 per gallon.

For biodiesel blends (of varied blended ratios), the EMI finds that on December 21, 2016, the average margin per gallon was \$0.5134 for all Pilot/Flying J retail outlets. Across the nation and depending on location, stores reported ranges between \$0.1050 to \$0.9500 per gallon.

When taking into account margins on both E10 blends and various biodiesel blends, the EMI finds that on December 21, 2016, there was a nationwide range in gross combined margins between \$0.2675 and \$1.3106 per gallon for Pilot/Flying J retail outlets, depending on location. The EMI found \$0.6649 per gallon as the per store average nationwide.

E-10	Diesel Blends	Combined Per Store
Min Per Gal	Min Per Gal	Min Per Gal
\$(0.1265)	\$0.1050	\$0.2675
Max Per Gal	Max per Gal	Max per Gal
\$0.5190	\$0.9500	\$1.3106
Average Per Store/Gal	Average Per Store/Gal	Average Per Store/Gal
\$0.1515	\$0.5134	\$0.6649

## b) Loves

The EMI similarly derives gross margins for E-10 blends and various biodiesel blends, along with gross combined margins across both products.

For E10 blends, the EMI finds that on December 5, 2016, the average margin per gallon was \$0.1459 for all Loves retail outlets. Across the nation and depending on location, stores reported ranges between \$0.0765 and \$0.5143 per gallon.

For biodiesel blends (of varied blend ratios), the EMI finds that on December 5, 2016, the average margin per gallon was \$0.5073 for all Loves retail outlets. Across the nation and depending on location, stores reported ranges between \$0.0978 to \$0.9162 per gallon.

When taking into account margins on both gasoline ethanol and biodiesel blends, the EMI finds that on December 5, 2016, there was a nationwide range in gross margins between \$0.3087 and \$1.1883 per gallon for Loves retail outlets, depending on location. The nationwide store average was \$0.6532 per gallon.

E-10	Diesel Blends	Combined Per Store
Min Per Gal	Min Per Gal	Min Per Gal
\$(0.0765)	0.0978	\$0.3087
Max Per Gal	Max per Gal	Max per Gal
\$0.5143	\$0.9162	\$1.1883
Average Per Store/Gal	Average Per Store/Gal	Average Per Store/Gal
\$0.1459	\$0.5073	\$0.6532

## III. Discussion

Up until this point data limitations and modeling complexity have confounded proper assessment of fuel margins, but the EMI accounts for these limitations by taking the novel approach of utilizing reliable daily information to demonstrate the composition—and distribution—of margins within fuels markets. The conclusions drawn from the EMI also provide a basis for subsequent monthly, quarterly, and annual projections that can instill greater certainty into the true dynamics of retail fuel competition—and the fuel market writ large.

In sum, the model shows that large fuel retailers, but not small fuel retailers, are receiving margins that are nearly double the national average to the detriment of overall market competition. Furthermore, it shows that no financial harm would befall large fuel retailers if the point of obligation were to be altered.



## About the Author



Ramon M Benavides entered the US Renewable Fuel Sector as a partner/producer for a biodiesel facility in October 2006 through Feb 2012. During that period, he oversought RINs trading activities for the company and, participated with the National Biodiesel Board by serving the regulatory, technical committees and RFS1 working group.

In 2010, he was nominated and elected to the NBB governing board and served that position until the end of the term in 2012. In early 2012, he left the production program and began Global Renewable Strategies and Consulting, LLC based upon an identified need for competent business consulting with the US renewable programs.

As a consultant, he has served Obligated Parties, Renewable Fuel Producers, Foreign Renewable Fuel Producers, Legal counsels, Tax Counsels, Accountants and others. He has monitored and advised RINs Trading/Renewable Fuels transactions and has observed and deployed many trading strategies.

He developed the first Compliance Surety Survey that tracks 1200 items daily, the first and only patent pending Forensic Surveillance Testing program, and a newly developed Forensic Mass Balance Protocol that when combined with the FST provides near term identification of issues and further authenticates RIN generations outside of the EPA QAP program.

GRSAC provides many services as listed at [www.grsac.org](http://www.grsac.org)



## Appendix One – EMI Model Results

**Pilot/Flying J Ethanol**  
**21 Dec 2016**

Pilot/Flying J Ethanol 21 Dec 2016

		Ethanol Delivered	Ethanol Delivered Minus RIN
E100 FOB	\$1.5700	\$1.7900	\$1.6950
(RIN)	0.95		
(CI)	\$95.5000		
National Average RBOB	\$1.5900		
Terminal Cost	\$0.0200		



## Pilot/Flying J Ethanol 21 Dec 2016

AL	Pilot	Travel	Center	#75	Satsuma	\$	2.06	\$ 0.39	\$	1.67	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1444
AL	Pilot	Travel	Center	#76	Tuscaloosa	\$	1.94	\$ 0.39	\$	1.55	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0241
AL	Pilot	Travel	Center	#4555	Monteale	\$	1.94	\$ 0.39	\$	1.55	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0244
AL	Pilot	Travel	Center	#302	Decatur	\$	2.00	\$ 0.39	\$	1.61	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0844
AL	Pilot	Travel	Center	#369	Birmingham	\$	1.94	\$ 0.39	\$	1.55	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0244
AL	Pilot	Travel	Center	#441	Prichville	\$	1.79	\$ 0.39	\$	1.57	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0441
AL	Pilot	Travel	Center	#497	Lincoln	\$	1.96	\$ 0.39	\$	1.57	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0444
M	Flying	J		#601	McCalla	\$	1.96	\$ 0.39	\$	1.57	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0441
AL	Flying	J		#602	Birmingham	\$	1.94	\$ 0.39	\$	1.55	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0244
AL	Flying	J		#603	Dothan	\$	1.96	\$ 0.39	\$	1.57	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0441
AL	Flying	J		#604	Hope Hall	\$	1.98	\$ 0.39	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0644
AL	Pilot	Travel	Center	#1549	Lincoln	\$	1.96	\$ 0.39	\$	1.57	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0444
AL	Pilot	Travel	Center	#1550	Good Hope	\$	1.94	\$ 0.39	\$	1.55	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0244
AR	Pilot	Travel	Center	#118	Penon	\$	1.96	\$ 0.40	\$	1.56	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0355
AR	Pilot	Travel	Center	#145	Springdale	\$	1.96	\$ 0.40	\$	1.56	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0355
AR	Pilot	Travel	Center	#332	North Little Rock	\$	1.94	\$ 0.40	\$	1.54	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0155
AR	Pilot	Travel	Center	#429	West Memphis	\$	2.00	\$ 0.40	\$	1.60	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0755
AR	Pilot	Travel	Center	#430	Russellville	\$	2.00	\$ 0.40	\$	1.60	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0755
AR	Pilot	Travel	Center	#492	Caddo Valley	\$	1.98	\$ 0.40	\$	1.58	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0555
AR	Flying	J		#605	Russellville	\$	2.00	\$ 0.40	\$	1.60	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0755
AR	Flying	J		#606	Texarkana	\$	2.00	\$ 0.40	\$	1.60	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0755
AR	Flying	J		#607	West Memphis	\$	2.00	\$ 0.40	\$	1.60	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0755
AZ	Pilot	Travel	Center	#180	Bellmont	\$	2.06	\$ 0.37	\$	1.69	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1635
AZ	Pilot	Travel	Center	#211	Lake Havasu City	\$	2.00	\$ 0.37	\$	1.75	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2635
AZ	Pilot	Travel	Center	#279	Rio Rico	\$	2.00	\$ 0.37	\$	1.63	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1035
AZ	Pilot	Travel	Center	#328	Quartzsite	\$	2.06	\$ 0.37	\$	1.70	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2635
AZ	Pilot	Travel	Center	#438	Eliz	\$	1.96	\$ 0.37	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0635
AZ	Pilot	Travel	Center	#439	Avondale	\$	1.96	\$ 0.37	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0635
AZ	Flying	J	US	#503	Yuma	\$	1.96	\$ 0.37	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0645
AZ	Pilot	Travel	Center	#505	Ducson	\$	1.96	\$ 0.37	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0635
AZ	Flying	J		#608	Ehrenberg	\$	2.26	\$ 0.37	\$	1.89	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3635
AZ	Flying	J		#609	Ipai	\$	1.96	\$ 0.37	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0635
AZ	Flying	J		#610	Kingman	\$	2.00	\$ 0.37	\$	1.63	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1035
AZ	Flying	J		#611	Phoenis	\$	1.96	\$ 0.37	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0635
AZ	Flying	J		#612	Winslow	\$	2.10	\$ 0.37	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2035
CA	Pilot	Travel	Center	#137	Weed	\$	2.20	\$ 0.57	\$	2.03	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.5078
CA	Pilot	Travel	Center	#154	Lost Hills	\$	2.30	\$ 0.57	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2078
CA	Pilot	Travel	Center	#168	Dunsmuir	\$	2.30	\$ 0.57	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2078
CA	Pilot	Travel	Center	#200	Boron	\$	2.30	\$ 0.57	\$	1.93	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.4078
CA	Pilot	Travel	Center	#237	Salinas	\$	2.30	\$ 0.57	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2078
CA	Pilot	Travel	Center	#282	Barstow	\$	2.36	\$ 0.57	\$	1.79	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2678
CA	Pilot	Travel	Center	#307	North Palm Springs	\$	2.30	\$ 0.57	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2078
CA	Pilot	Travel	Center	#343	San Diego	\$	2.40	\$ 0.57	\$	1.83	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3078
CA	Pilot	Travel	Center	#363	Madera	\$	2.30	\$ 0.57	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2078
CA	Pilot	Travel	Center	#372	Castaic	\$	2.56	\$ 0.57	\$	1.99	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.4678
CA	Pilot	Travel	Center	#381	Hesperia	\$	2.40	\$ 0.57	\$	1.83	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3078
CA	Flying	J		#613	Bakersfield	\$	2.36	\$ 0.57	\$	1.79	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2678
CA	Flying	J		#614	Barstow	\$	2.30	\$ 0.57	\$	1.79	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2678
CA	Flying	J		#616	Frazier Park	\$	2.40	\$ 0.57	\$	1.83	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3078
CA	Flying	J		#617	Josh	\$	2.30	\$ 0.57	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2078
CA	Flying	J		#618	Ripon	\$	2.40	\$ 0.57	\$	1.83	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3078
CA	Flying	J		#765	Thousand Palms	\$	2.40	\$ 0.57	\$	1.83	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3078
CA	Pilot	Dealer		#879	Sacramento	\$	2.40	\$ 0.57	\$	1.83	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3088
CA	Pilot	Travel	Center	#1019	Orland	\$	2.30	\$ 0.57	\$	1.73	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2078
CA	Flying	J		#1080	Patterson	\$	2.40	\$ 0.57	\$	1.83	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.3078
CO	Pilot	Travel	Center	#310	Denver	\$	2.04	\$ 0.40	\$	1.64	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1335
CO	Pilot	Travel	Center	#592	Grand Junction	\$	2.16	\$ 0.40	\$	1.76	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2335
CO	Flying	J		#619	Jurora	\$	2.00	\$ 0.40	\$	1.60	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0735
CO	Flying	J		#621	Limon	\$	2.06	\$ 0.40	\$	1.66	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1335
CT	Pilot	Travel	Center	#781	Stearnsot Springs	\$	2.20	\$ 0.40	\$	1.80	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2735
CT	Pilot	Dealer		#255	Malford	\$	2.20	\$ 0.56	\$	1.64	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1105
CT	Pilot	Travel	Center	#882	North Stonington	\$	2.20	\$ 0.56	\$	1.64	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1105
FL	Pilot	Travel	Center	#4556	Wildwood	\$	2.26	\$ 0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Travel	Center	#87	Baldwin	\$	2.16	\$ 0.55	\$	1.61	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0877
FL	Pilot	Travel	Center	#88	Cocoa	\$	2.26	\$ 0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Travel	Center	#89	Flintm-n	\$	2.20	\$ 0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Travel	Center	#90	Fort Pierce	\$	2.23	\$ 0.55	\$	1.68	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1577
FL	Pilot	Travel	Center	#91	Jacksonville	\$	2.20	\$ 0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Travel	Center	#92	Ocala	\$	2.30	\$ 0.55	\$	1.75	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2277
FL	Pilot	Travel	Center	#94	Punta Gorda	\$	2.20	\$ 0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877

FL	Pilot	Travel	Center	#95	Wildwood	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Travel	Center	#96	Okcecho Bee	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Travel	Center	#293	Ocala	\$	2.30	\$	0.55	\$	1.75	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2277
FL	Pilot	Travel	Center	#352	Fort Myers	\$	2.30	\$	0.55	\$	1.75	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2277
FL	Pilot	Travel	Center	#374	Marianna	\$	2.14	\$	0.55	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0677
FL	Pilot	Travel	Center	#424	Ocala	\$	2.30	\$	0.55	\$	1.75	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2277
FL	Pilot	Travel	Center	#425	Midway	\$	2.24	\$	0.55	\$	1.69	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1677
FL	Pilot	Travel	Center	#471	Haines City	\$	2.20	\$	0.55	\$	1.65	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1277
FL	Pilot	Travel	Center	#500	Jasper	\$	2.23	\$	0.55	\$	1.68	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1577
FL	Flying	J		#622	Fort Pierce	\$	2.14	\$	0.55	\$	1.59	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0677
FL	Flying	J		#623	Quincy	\$	2.24	\$	0.55	\$	1.69	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1677
FL	Flying	J		#624	Dade City	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Flying	J		#625	Tampa	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Flying	J		#626	St. Augustine	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Dealer		#873	Medley	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Dealer		#874	Miami	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Dealer		#897	Miami Gardens	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.2277
FL	Pilot	Travel	Center	#1040	South Bay	\$	2.30	\$	0.55	\$	1.75	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Travel	Center	#1047	Jacksonville	\$	2.26	\$	0.55	\$	1.71	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1877
FL	Pilot	Dealer		#1058	Waldo	\$	2.20	\$	0.55	\$	1.65	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.1677
GA	Pilot	Travel	Center	#65	Augusta	\$	1.98	\$	0.49	\$	1.57	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0818
GA	Pilot	Travel	Center	#66	Trasleron	\$	2.00	\$	0.49	\$	1.61	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0818
GA	Pilot	Travel	Center	#67	Cartersville	\$	2.10	\$	0.49	\$	1.61	\$	1.43	\$	0.17	\$	1.60	\$	0.095	\$	1.53	\$	0.0818
GA	Pilot	Travel	Center	#68	Dublin	\$	2.10	\$	0.49	\$	1.61	\$	1.43	\$									

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Row	Asset	Index 1	Index 2	Index 3	City	Brand F10	F10	F10	Wholesale F10	RW F10	Partners	Ertrand	Partners	Ertr Price	RUN Incentive	ETM Minor RUN Plus	Terminal	F10 Margin
OK	Flt				San Francisco	\$	2.10	\$ 0.55	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.5549
OK	Flt				San Francisco	\$	2.40	\$ 0.55	\$	1.30	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.3549
OK	Flt				San Francisco	\$	2.10	\$ 0.55	\$	1.24	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1149
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.30	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.20	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595
OK	Flt				San Francisco	\$	2.30	\$ 0.61	\$	1.09	\$	1.43	\$	0.17	\$ 1.60	\$ 0.095	\$	0.1595



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WY	Pilot	Travel	Center	#141	Evanston	\$	1.96	\$ 0.42	\$ 1.54	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Pilot	Travel	Center	#58	Elkville	\$	1.96	\$ 0.42	\$ 1.54	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Pilot	Travel	Center	#402	Cheyenne	\$	2.00	\$ 0.42	\$ 1.58	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Flying	J		#58	Casper	\$	1.96	\$ 0.42	\$ 1.54	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Flying	J		#759	Cheyenne	\$	2.00	\$ 0.42	\$ 1.64	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Flying	J		#761	Elkville	\$	2.00	\$ 0.42	\$ 1.58	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Flying	J		#761	Evanston	\$	1.96	\$ 0.42	\$ 1.54	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Flying	J		#762	Elkville	\$	2.00	\$ 0.42	\$ 1.58	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Flying	J		#763	Rawlins	\$	2.00	\$ 0.42	\$ 1.58	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135
WY	Flying	J		#764	Rock Springs	\$	2.00	\$ 0.42	\$ 1.64	\$ 1.43	\$ 0.17	\$ 1.60	\$ 0.095	\$ 1.53	\$ 0.0135

**Pilot/Flying J Biodiesel**  
**21 Dec 2016**



Pilot/Flying J Biodiesel 21 Dec 2016

	SME BODIESEL	B100 Delivered	Biodiesel without RIN	Biodiesel without BTC	Biodiesel without LCFS
B100 with RIN	\$3.2900	\$3.5500	\$1.8400	\$0.8400	\$0.5185
(RIN)	\$1.1400				
(Excise)	\$1.0000				
(CI)	\$95.5000				
National Average Diesel	\$1.6200				

## Pilot/Flying J Biodiesel 21 Dec 2016

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State	County	Sub 1	Sub 2	Sub 3	Sub 4	Sub 5	Sub 6	Sub 7	Sub 8	Sub 9	Sub 10	Sub 11	Sub 12	Sub 13	Sub 14	Sub 15	Sub 16	Sub 17	Sub 18	Sub 19	Sub 20	Sub 21	Sub 22	Sub 23	Sub 24	Sub 25	Sub 26	Sub 27	Sub 28	Sub 29	Sub 30	Sub 31	Sub 32	Sub 33	Sub 34	Sub 35	Sub 36	Sub 37	Sub 38	Sub 39	Sub 40	Sub 41	Sub 42	Sub 43	Sub 44	Sub 45	Sub 46	Sub 47	Sub 48	Sub 49	Sub 50	Sub 51	Sub 52	Sub 53	Sub 54	Sub 55	Sub 56	Sub 57	Sub 58	Sub 59	Sub 60	Sub 61	Sub 62	Sub 63	Sub 64	Sub 65	Sub 66	Sub 67	Sub 68	Sub 69	Sub 70	Sub 71	Sub 72	Sub 73	Sub 74	Sub 75	Sub 76	Sub 77	Sub 78	Sub 79	Sub 80	Sub 81	Sub 82	Sub 83	Sub 84	Sub 85	Sub 86	Sub 87	Sub 88	Sub 89	Sub 90	Sub 91	Sub 92	Sub 93	Sub 94	Sub 95	Sub 96	Sub 97	Sub 98	Sub 99	Sub 100	Sub 101	Sub 102	Sub 103	Sub 104	Sub 105	Sub 106	Sub 107	Sub 108	Sub 109	Sub 110	Sub 111	Sub 112	Sub 113	Sub 114	Sub 115	Sub 116	Sub 117	Sub 118	Sub 119	Sub 120	Sub 121	Sub 122	Sub 123	Sub 124	Sub 125	Sub 126	Sub 127	Sub 128	Sub 129	Sub 130	Sub 131	Sub 132	Sub 133	Sub 134	Sub 135	Sub 136	Sub 137	Sub 138	Sub 139	Sub 140	Sub 141	Sub 142	Sub 143	Sub 144	Sub 145	Sub 146	Sub 147	Sub 148	Sub 149	Sub 150	Sub 151	Sub 152	Sub 153	Sub 154	Sub 155	Sub 156	Sub 157	Sub 158	Sub 159	Sub 160	Sub 161	Sub 162	Sub 163	Sub 164	Sub 165	Sub 166	Sub 167	Sub 168	Sub 169	Sub 170	Sub 171	Sub 172	Sub 173	Sub 174	Sub 175	Sub 176	Sub 177	Sub 178	Sub 179	Sub 180	Sub 181	Sub 182	Sub 183	Sub 184	Sub 185	Sub 186	Sub 187	Sub 188	Sub 189	Sub 190	Sub 191	Sub 192	Sub 193	Sub 194	Sub 195	Sub 196	Sub 197	Sub 198	Sub 199	Sub 200	Sub 201	Sub 202	Sub 203	Sub 204	Sub 205	Sub 206	Sub 207	Sub 208	Sub 209	Sub 210	Sub 211	Sub 212	Sub 213	Sub 214	Sub 215	Sub 216	Sub 217	Sub 218	Sub 219	Sub 220	Sub 221	Sub 222	Sub 223	Sub 224	Sub 225	Sub 226	Sub 227	Sub 228	Sub 229	Sub 230	Sub 231	Sub 232	Sub 233	Sub 234	Sub 235	Sub 236	Sub 237	Sub 238	Sub 239	Sub 240	Sub 241	Sub 242	Sub 243	Sub 244	Sub 245	Sub 246	Sub 247	Sub 248	Sub 249	Sub 250	Sub 251	Sub 252	Sub 253	Sub 254	Sub 255	Sub 256	Sub 257	Sub 258	Sub 259	Sub 260	Sub 261	Sub 262	Sub 263	Sub 264	Sub 265	Sub 266	Sub 267	Sub 268	Sub 269	Sub 270	Sub 271	Sub 272	Sub 273	Sub 274	Sub 275	Sub 276	Sub 277	Sub 278	Sub 279	Sub 280	Sub 281	Sub 282	Sub 283	Sub 284	Sub 285	Sub 286	Sub 287	Sub 288	Sub 289	Sub 290	Sub 291	Sub 292	Sub 293	Sub 294	Sub 295	Sub 296	Sub 297	Sub 298	Sub 299	Sub 300	Sub 301	Sub 302	Sub 303	Sub 304	Sub 305	Sub 306	Sub 307	Sub 308	Sub 309	Sub 310	Sub 311	Sub 312	Sub 313	Sub 314	Sub 315	Sub 316	Sub 317	Sub 318	Sub 319	Sub 320	Sub 321	Sub 322	Sub 323	Sub 324	Sub 325	Sub 326	Sub 327	Sub 328	Sub 329	Sub 330	Sub 331	Sub 332	Sub 333	Sub 334	Sub 335	Sub 336	Sub 337	Sub 338	Sub 339	Sub 340	Sub 341	Sub 342	Sub 343	Sub 344	Sub 345	Sub 346	Sub 347	Sub 348	Sub 349	Sub 350	Sub 351	Sub 352	Sub 353	Sub 354	Sub 355	Sub 356	Sub 357	Sub 358	Sub 359	Sub 360	Sub 361	Sub 362	Sub 363	Sub 364	Sub 365	Sub 366	Sub 367	Sub 368	Sub 369	Sub 370	Sub 371	Sub 372	Sub 373	Sub 374	Sub 375	Sub 376	Sub 377	Sub 378	Sub 379	Sub 380	Sub 381	Sub 382	Sub 383	Sub 384	Sub 385	Sub 386	Sub 387	Sub 388	Sub 389	Sub 390	Sub 391	Sub 392	Sub 393	Sub 394	Sub 395	Sub 396	Sub 397	Sub 398	Sub 399	Sub 400	Sub 401	Sub 402	Sub 403	Sub 404	Sub 405	Sub 406	Sub 407	Sub 408	Sub 409	Sub 410	Sub 411	Sub 412	Sub 413	Sub 414	Sub 415	Sub 416	Sub 417	Sub 418	Sub 419	Sub 420	Sub 421	Sub 422	Sub 423	Sub 424	Sub 425	Sub 426	Sub 427	Sub 428	Sub 429	Sub 430	Sub 431	Sub 432	Sub 433	Sub 434	Sub 435	Sub 436	Sub 437	Sub 438	Sub 439	Sub 440	Sub 441	Sub 442	Sub 443	Sub 444	Sub 445	Sub 446	Sub 447	Sub 448	Sub 449	Sub 450	Sub 451	Sub 452	Sub 453	Sub 454	Sub 455	Sub 456	Sub 457	Sub 458	Sub 459	Sub 460	Sub 461	Sub 462	Sub 463	Sub 464	Sub 465	Sub 466	Sub 467	Sub 468	Sub 469	Sub 470	Sub 471	Sub 472	Sub 473	Sub 474	Sub 475	Sub 476	Sub 477	Sub 478	Sub 479	Sub 480	Sub 481	Sub 482	Sub 483	Sub 484	Sub 485	Sub 486	Sub 487	Sub 488	Sub 489	Sub 490	Sub 491	Sub 492	Sub 493	Sub 494	Sub 495	Sub 496	Sub 497	Sub 498	Sub 499	Sub 500	Sub 501	Sub 502	Sub 503	Sub 504	Sub 505	Sub 506	Sub 507	Sub 508	Sub 509	Sub 510	Sub 511	Sub 512	Sub 513	Sub 514	Sub 515	Sub 516	Sub 517	Sub 518	Sub 519	Sub 520	Sub 521	Sub 522	Sub 523	Sub 524	Sub 525	Sub 526	Sub 527	Sub 528	Sub 529	Sub 530	Sub 531	Sub 532	Sub 533	Sub 534	Sub 535	Sub 536	Sub 537	Sub 538	Sub 539	Sub 540	Sub 541	Sub 542	Sub 543	Sub 544	Sub 545	Sub 546	Sub 547	Sub 548	Sub 549	Sub 550	Sub 551	Sub 552	Sub 553	Sub 554	Sub 555	Sub 556	Sub 557	Sub 558	Sub 559	Sub 560	Sub 561	Sub 562	Sub 563	Sub 564	Sub 565	Sub 566	Sub 567	Sub 568	Sub 569	Sub 570	Sub 571	Sub 572	Sub 573	Sub 574	Sub 575	Sub 576	Sub 577	Sub 578	Sub 579	Sub 580	Sub 581	Sub 582	Sub 583	Sub 584	Sub 585	Sub 586	Sub 587	Sub 588	Sub 589	Sub 590	Sub 591	Sub 592	Sub 593	Sub 594	Sub 595	Sub 596	Sub 597	Sub 598	Sub 599	Sub 600	Sub 601	Sub 602	Sub 603	Sub 604	Sub 605	Sub 606	Sub 607	Sub 608	Sub 609	Sub 610	Sub 611	Sub 612	Sub 613	Sub 614	Sub 615	Sub 616	Sub 617	Sub 618	Sub 619	Sub 620	Sub 621	Sub 622	Sub 623	Sub 624	Sub 625	Sub 626	Sub 627	Sub 628	Sub 629	Sub 630	Sub 631	Sub 632	Sub 633	Sub 634	Sub 635	Sub 636	Sub 637	Sub 638	Sub 639	Sub 640	Sub 641	Sub 642	Sub 643	Sub 644	Sub 645	Sub 646	Sub 647	Sub 648	Sub 649	Sub 650	Sub 651	Sub 652	Sub 653	Sub 654	Sub 655	Sub 656	Sub 657	Sub 658	Sub 659	Sub 660	Sub 661	Sub 662	Sub 663	Sub 664	Sub 665	Sub 666	Sub 667	Sub 668	Sub 669	Sub 670	Sub 671	Sub 672	Sub 673	Sub 674	Sub 675	Sub 676	Sub 677	Sub 678	Sub 679	Sub 680	Sub 681	Sub 682	Sub 683	Sub 684	Sub 685	Sub 686	Sub 687	Sub 688	Sub 689	Sub 690	Sub 691	Sub 692	Sub 693	Sub 694	Sub 695	Sub 696	Sub 697	Sub 698	Sub 699	Sub 700	Sub 701	Sub 702	Sub 703	Sub 704	Sub 705	Sub 706	Sub 707	Sub 708	Sub 709	Sub 710	Sub 711	Sub 712	Sub 713	Sub 714	Sub 715	Sub 716	Sub 717	Sub 718	Sub 719	Sub 720	Sub 721	Sub 722	Sub 723	Sub 724	Sub 725	Sub 726	Sub 727	Sub 728	Sub 729	Sub 730	Sub 731	Sub 732	Sub 733	Sub 734	Sub 735	Sub 736	Sub 737	Sub 738	Sub 739	Sub 740	Sub 741	Sub 742	Sub 743	Sub 744	Sub 745	Sub 746	Sub 747	Sub 748	Sub 749	Sub 750	Sub 751	Sub 752	Sub 753	Sub 754	Sub 755	Sub 756	Sub 757	Sub 758	Sub 759	Sub 760	Sub 761	Sub 762	Sub 763	Sub 764	Sub 765	Sub 766	Sub 767	Sub 768	Sub 769	Sub 770	Sub 771	Sub 772	Sub 773	Sub 774	Sub 775	Sub 776	Sub 777	Sub 778	Sub 779	Sub 780	Sub 781	Sub 782	Sub 783	Sub 784	Sub 785	Sub 786	Sub 787	Sub 788	Sub 789	Sub 790	Sub 791	Sub 792	Sub 793	Sub 794	Sub 795	Sub 796	Sub 797	Sub 798	Sub 799	Sub 800	Sub 801	Sub 802	Sub 803	Sub 804	Sub 805	Sub 806	Sub 807	Sub 808	Sub 809	Sub 810	Sub 811	Sub 812	Sub 813	Sub 814	Sub 815	Sub 816	Sub 817	Sub 818	Sub 819	Sub 820	Sub 821	Sub 822	Sub 823	Sub 824	Sub 825	Sub 826	Sub 827	Sub 828	Sub 829	Sub 830	Sub 831	Sub 832	Sub 833	Sub 834	Sub 835	Sub 836	Sub 837	Sub 838	Sub 839	Sub 840	Sub 841	Sub 842	Sub 843	Sub 844	Sub 845	Sub 846	Sub 847	Sub 848	Sub 849	Sub 850	Sub 851	Sub 852	Sub 853	Sub 854	Sub 855	Sub 856	Sub 857	Sub 858	Sub 859	Sub 860	Sub 861	Sub 862	Sub 863	Sub 864	Sub 865	Sub 866	Sub 867	Sub 868	Sub 869	Sub 870	Sub 871	Sub 872	Sub 873	Sub 874	Sub 875	Sub 876	Sub 877	Sub 878	Sub 879	Sub 880	Sub 881	Sub 882	Sub 883	Sub 884	Sub 885	Sub 886	Sub 887	Sub 888	Sub 889	Sub 890	Sub 891	Sub 892	Sub 893	Sub 894	Sub 895	Sub 896	Sub 897	Sub 898	Sub 899	Sub 900	Sub 901	Sub 902	Sub 903	Sub 904	Sub 905	Sub 906	Sub 907	Sub 908	Sub 909	Sub 910	Sub 911	Sub 912	Sub 913	Sub 914	Sub 915	Sub 916	Sub 917	Sub 918	Sub 919	Sub 920	Sub 921	Sub 922	Sub 923	Sub 924	Sub 925	Sub 926	Sub 927	Sub 928	Sub 929	Sub 930	Sub 931	Sub 932	Sub 933	Sub 934	Sub 935	Sub 936	Sub 937	Sub 938	Sub 939	Sub 940	Sub 941	Sub 942	Sub 943	Sub 944	Sub 945	Sub 946	Sub 947	Sub 948	Sub 949	Sub 950	Sub 951	Sub 952	Sub 953	Sub 954	Sub 955	Sub 956	Sub 957	Sub 958	Sub 959	Sub 960	Sub 961	Sub 962	Sub 963	Sub 964	Sub 965	Sub 966	Sub 967	Sub 968	Sub 969	Sub 970	Sub 971	Sub 972	Sub 973	Sub 974	Sub 975	Sub 976	Sub 977	Sub 978	Sub 979	Sub 980	Sub 981	Sub 982	Sub 983	Sub 984	Sub 985	Sub 986	Sub 987	Sub 988	Sub 989	Sub 990	Sub 991	Sub 992	Sub 993	Sub 994	Sub 995	Sub 996	Sub 997	Sub 998	Sub 999	Sub 1000
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**Pilot/Flying J Ethanol and Biodiesel Total**  
**21 Dec 2016**



Pilot/Flying J Ethanol and Biodiesel Total 21 Dec 2016

State	Starc	Info 1	Info 2	Info 3	City	Total March At Station
AL	Pilot	Travel	Center	#75	Satsuma	\$ 0.6560
AL	Pilot	Travel	Center	#76	Tuscaloosa	\$ 0.4615
AL	Pilot	Travel	Center	#4555	Cottondale	\$ 0.3905
AL	Pilot	Travel	Center	#302	Theodore	\$ 0.5960
AL	Pilot	Travel	Center	#369	Birmingham	\$ 0.5715
AL	Pilot	Travel	Center	#441	Priceville	\$ 0.5315
AL	Pilot	Travel	Center	#497	Lincoln	\$ 0.5915
AL	Flying	J		#601	McCalla	\$ 0.4815
AL	Flying	J		#602	Birmingham	\$ 0.5715
AL	Flying	J		#603	Dothan	\$ 0.5205
AL	Flying	J		#604	Hope Hull	\$ 0.6115
AL	Pilot	Travel	Center	#1549	Lincoln	\$ 0.5205
AL	Pilot	Travel	Center	#1550	Good Hope	\$ 0.5115
AR	Pilot	Travel	Center	#118	Benton	\$ 0.5380
AR	Pilot	Travel	Center	#145	Springdale	\$ 0.5135
AR	Pilot	Travel	Center	#332	North Little Rock	\$ 0.5580
AR	Pilot	Travel	Center	#429	West Memphis	\$ 0.5825
AR	Pilot	Travel	Center	#430	Russellville	\$ 0.5425
AR	Pilot	Travel	Center	#492	Caddo Valley	\$ 0.4625
AR	Flying	J		#605	Russellville	\$ 0.5425
AR	Flying	J		#606	Texarkana	\$ 0.5180
AR	Flying	J		#607	West Memphis	\$ 0.5825
AZ	Pilot	Travel	Center	#180	Bellemont	\$ 0.7885
AZ	Pilot	Travel	Center	#211	Lake Havasu City	\$ 0.8995
AZ	Pilot	Travel	Center	#279	Rio Rico	\$ 0.7040
AZ	Pilot	Travel	Center	#328	Quartzsite	\$ 0.9240
AZ	Pilot	Travel	Center	#458	Eloy	\$ 0.6995
AZ	Pilot	Travel	Center	#459	Avondale	\$ 0.5395
AZ	Flying	J	US	#505	Yuma	\$ 0.6895
AZ	Pilot	Travel	Center	#593	Tucson	\$ 0.6640
AZ	Flying	J		#608	Ehrenberg	\$ 1.0240
AZ	Flying	J		#609	Eloy	\$ 0.6995
AZ	Flying	J		#610	Kingman	\$ 0.7995
AZ	Flying	J		#611	Phoenix	\$ 0.5395
AZ	Flying	J		#612	Winslow	\$ 0.8995
CA	Pilot	Travel	Center	#137	Weed	\$ 1.2578
CA	Pilot	Travel	Center	#154	Lost Hills	\$ 1.0094
CA	Pilot	Travel	Center	#168	Dunnigan	\$ 0.9578
CA	Pilot	Travel	Center	#200	Boron	\$ 1.1094
CA	Pilot	Travel	Center	#237	Salinas	\$ 1.0694
CA	Pilot	Travel	Center	#282	Barstow	\$ 0.9894
CA	Pilot	Travel	Center	#307	North Palm Springs	\$ 1.0694
CA	Pilot	Travel	Center	#343	San Diego	\$ 1.1609
CA	Pilot	Travel	Center	#365	Madera	\$ 1.0094